

EW

EPA

Add
Change
Delete

(T)

Requested by
DateKathleen
RawelsonEPA
FATES

FINDS Input Form

EPA ID Number:	WAD 988471173		
x Facility Name:	Washington Water Power at Fairchild AFB		
x Street:	Fairchild AFB - Banks of DEEP CRK		
x City:	SPOKANE	x State:	WA
		x Zip Code:	99011
County Code :	063 / Spokane	Congressional District :	
x Owner Type :	(X) 2P	Operator Type :	
Latitude :		Lat-Long Source :	
Longitude :		Lat-Long Accuracy :	
SIC Codes :			
Indian Land :	(Y,N)	Federal Facility :	(Y,N)
Comments :			
HWDMS (OSW) :			
PCS (OWEP) :			
CDS (OAR) :			
FATES (OPTS) :	X		
CERCLIS (OERR) :			
DOCKET (OECM) :			
FURS (OW) :			
FRDS (ODW) :			
SIA :			
HWCTDB (OSW) :			
CICIS (OTS) :			
STATE SYS :			

Date Received:

11/6

Loaded by:

pat

Assigned:

Date:

11/7/89

Date:

Verified by:

Logged:

4

WWP 100
Washington Water Power
1889-1989

APR 13 1989

Fred A. Shiosaki
Manager
Environment, Safety and Health

April 10, 1989

Ms. Eileen Hayes
Environmental Protection Agency
1200 Sixth Ave.
Seattle, WA 98101

Dear Ms. Hayes:

Attached are the latest PCB laboratory test results as requested for the transformers that were retrofilled at the Fairchild Air Force Base water pump station site. Transformers were retrofilled on September 15, 1989, placed back in service immediately and resampled in March 1989. Pole mount transformer #7335024 (300ppm) has been removed from service for disposal.

Transformers 6912141, 6912147, and 691249 are scheduled for retrofit again this spring. We will contact EPA as soon as these transformers are retested.

Sincerely,


Douglas K. Pottratz

pjl

cc: Gary Gespersion, FAFB

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4630 PACIFIC HIGHWAY EAST, SUITE B-14, TACOMA, WASHINGTON 98424 - TELEPHONE (206)922-2310 - FAX (206)922-5047

Report To: Washington Water Power

Date: March 17, 1989

Report On: PCB in Oil

Lab No.: A 5516-4

IDENTIFICATION:

Samples Received on 3-16-89

C-814 PO890103

Site: FORT WRIGHT

ANALYSIS:

<u>Laboratory Sample No.</u>	<u>Client Identification</u>	<u>PCB Type</u>	<u>PCB (mg/kg)</u>
6	1961-1	1260	2.4
7	1961-5	1260	37
8	1961-7	1260	8.0
9	6912141	1260	55
10	6912147	1260	54
11	6912149	1260	41
12	7222333	1260	21
13	7222334	1260	7.8
14	7222335	1260	16
15	7514286	1260	31
16	7514289	1260	18
17	7514291	1260	19

SOUND ANALYTICAL SERVICES

Brent HEPNER
BRENT HEPNER

JPR



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

177ES
[COPY

REPLY TO
ATTN OF:

AT-083

NOV 15 1988

Fred A. Shiosaki, Manager
Environmental Affairs
Washington Water Power
P.O. Box 3727
Spokane, Washington 99220

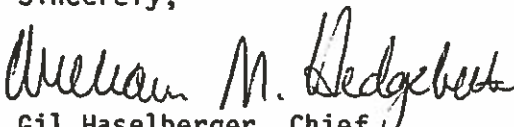
Dear Mr. Shiosaki:

This letter concerns your November 7, 1988, response to the Environmental Protection Agency's (EPA) Notice of Noncompliance dated September 30, 1988, concerning violations of the PCB Regulations.

We have reviewed the analytical results which you submitted with your letter. We appreciate your prompt attention in this matter. With the receipt of this information, EPA considers this case to be closed.

If you have any questions regarding the inspection or the PCB Regulations, please contact Eileen Hayes of my staff. She can be reached at EPA Region 10, 1200 Sixth Avenue, M/S AT-083, Seattle, Washington 98101; telephone (206) 442-2584.

Sincerely,

for 
Gil Haselberger, Chief
Toxic Substances Section



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

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FILE COPY

NOV 15 1988

REPLY TO
ATTN OF:

AT-083

Fred A. Shiosaki, Manager
Environmental Affairs
Washington Water Power
P.O. Box 3727
Spokane, Washington 99220

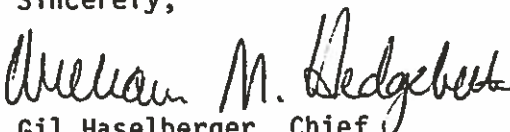
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This letter concerns your November 7, 1988, response to the Environmental Protection Agency's (EPA) Notice of Noncompliance dated September 30, 1988, concerning violations of the PCB Regulations.

We have reviewed the analytical results which you submitted with your letter. We appreciate your prompt attention in this matter. With the receipt of this information, EPA considers this case to be closed.

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Sincerely,

for 
Gil Haselberger, Chief
Toxic Substances Section



Washington Water Power

Fred A. Shiosaki
Manager
Environmental Affairs

RECEIVED
NOV 10 1988

November 7, 1988

Mr. Gil Haselberger, Chief
Toxic Substances Section
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Dear Mr. Haselberger: *Gil*

This letter is in response to your September 30, 1988 NOTICE OF NONCOMPLIANCE regarding leaking transformers at the Fairchild Air Force Base (FAFB) Geiger Reservoir and Water Pump Station Site No. 5. The notice requires that copies of post cleanup data at Water Pump Station No. 5 be sent to EPA as evidence of completion of cleanup. Attached to this letter are the laboratory results of soil samples taken subsequent to the cleanup. Removal of soil took place around the concrete pad supporting the leaking PCB-contaminated transformers. None was removed around the PCB transformers since there was no evidence of leaking. Attached is a diagram showing the location of soil samples taken within the substation. The levels indicate adequate soil cleanup around the contaminated transformers and no detectable levels of PCB elsewhere.

Retrofilling of all 6 transformers in substation No. 5 took place on September 15, 1988. A record of their eventual reclassification to non-PCB transformers will be in our 1988 or 1989 PCB Annual Report depending upon retest time and results.

In regards to ownership of the transformers, review of the FAFB Easement Deed and Bill of Sale by our attorney and Right of Way personnel indicates that the Water Pump Station transformers along the Spokane River are not part of the described property sold or transferred to Washington Water Power on June 18, 1962. In our opinion this equipment is the property of FAFB.

Sincerely,

Fred A. Shiosaki
Fred A. Shiosaki

pjl
Attachments
cc: Gary Gespersion, FAFB

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4630 PACIFIC HIGHWAY EAST, SUITE B-14 • TACOMA, WASHINGTON 98424 • TELEPHONE (206) 922 2310

Report To: Washington Water Power

Date: October 20, 1988

Report On: PCB In Soil

Lab No: A 4263-2

IDENTIFICATION:

C-695 P0880223

Samples submitted on October 14, 1988

Site: FAFB

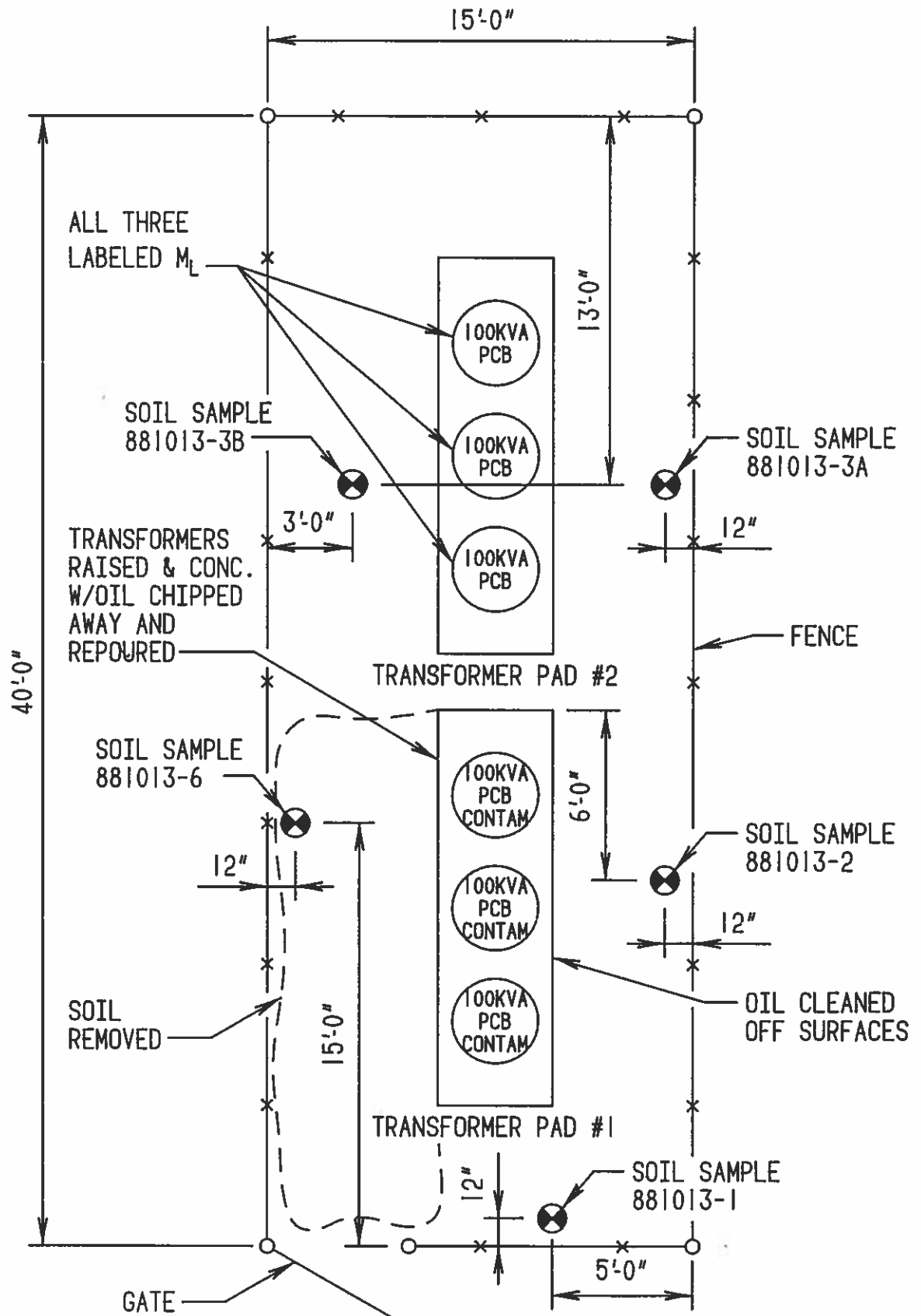
ANALYSIS:

<u>Laboratory Sample No.</u>	<u>Client Identification</u>	<u>PCB Type</u>	<u>PCB, mg/kg</u>
6	881013-1	----	< 0.1
7	881013-2	1260	0.9
8	881013-6	1260	0.2
9	881013-3A	----	< 0.1
10	881013-3B	----	< 0.1

SOUND ANALYTICAL SERVICES

Brent HEPNER
BRENT HEPNER

FAIRCHILD AIR FORCE BASE
 WATER PUMP STATION NO. 5
 POST CLEAN-UP SOIL SAMPLE SITES
 ALL TRANSFORMERS RETRO-FILLED SEPT. 15, 1988



Washington Water Power

**P.O. Box 3727
Spokane, Washington 99220**



Mr. Gil Haselberger, Chief
Toxic Substances Section
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

[illegible]

VIOLATION ASSESSMENT

M. Eileen Hayes, PCB Case Reviewer
(Name & title of Evaluator)

ACTION TAKEN

TSCA	X	(PCB)
FIFRA		

Washington Water Power At Fairchild AFB

	No Action Indicated
X	Notice Noncompliance
	Refer for Ad. Civil Penalty
	Refer for Criminal Penalty
	Refer to State

June 9, 1988
Date of Inspection

James F. Pankanin
Name of Inspector

Comments: EPA Region 10 files reveal no previous EPA TSCA PCB compliance history at this facility.

The inspection revealed the following violations.

Disposal: 2 Violations - Two General Electric transformers, serial numbers 1274190 and 1735550, that were servicing the pumphouse at the Geiger Reservoir were leaking at the time of the inspection. Although chemical analysis subsequent to the inspection showed both transformers to contain less than 50 parts per million, at the time of the inspection they were required to be assumed PCB-Contaminated Transformers; Oil-staining from the transformers owned by Washington Water Power at Well No. 5 was observed on the concrete base underneath the transformers at the time of the inspection. The transformers were assumed to be PCB Contaminated Transformers at the time of the inspection and chemical analysis subsequent to the inspection confirmed that the transformers were PCB-Contaminated transformers. This release of PCBs from one or more of these transformers constituted the improper disposal of PCBs.

Washington Water Power took immediate action to initiate cleanup of the spills, perform testing, retrofit the PCB Transformers, and mark all transformers that were not previously marked, even though the issue of ownership was, at that time, uncertain.

Recommend Notice of Noncompliance be sent to Washington Water Power

William M. Redgebein
Concur for the Evaluator

Do not Concur

FATES INSPECTION # _____

DATE ENTERED _____

CASE # _____

DATE ENTERED _____

DATE 9/16/88

FTTS PCB INSPECTION AND CASE REVIEW RECORD

LEGISLATION: T STATUS: ACTIVE
INSPECTION DATE: 01/01/0 TYPE: GPR-X-BPS
INSPECTOR NUMBER: ----- REASON: ---
INSPECTION SEQUENCE: --- FUNCTION: ---
INSPECTOR NAME: Jim Rankin DATE RECEIVED: 07/15/88

CBI ? : Y / N SIC CODE: ---
FEDERAL SITE ? : Y / N N I S: ---
REMARKS: -----
NUMBER OF SAMPLES: -----

NAME: Washington Water Power AT Fairchild Air Force Base .
ADDRESS: Fairchild Air Force Base
CITY: Spokane COUNTY: ---
STATE: WA ZIP: ---
DUNS NUMBER: WA-957-1924647

MAIL/PARENT CO. NAME: Washington Water Power
ADDRESS: 20 Box 3727
CITY: Spokane
STATE: WA ZIP: 99220-

CASE REVIEWER: E. Hayes
REVIEW STARTED: 07/10/88
REVIEW COMPLETED: 08/24/88
VIOLATION ? : Y / N
DOCKET NUMBER: ---
CASE NUMBER: 10-88

VIOLATION CODE
ACTION: ---
ACT: DATE --- / --- / ---
RES: DUE1 --- / --- / ---
RES: REC1 --- / --- / ---



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

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FILE COPY

SEP 30 1988

REPLY TO
ATTN OF: AT-083

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

NOTICE OF NONCOMPLIANCE

Fred Shiosaki, Manager
Environmental Affairs
Washington Water Power
P.O. Box 3727
Spokane, Washington 99220

Dear Mr. Shiosaki:

This letter concerns the June 7, 1988 Environmental Protection Agency (EPA) inspection performed by James F. Pankanin at Fairchild Air Force Base in Spokane, Washington. The inspection was carried out to determine compliance with the PCB (polychlorinated biphenyl) Regulations adopted by EPA pursuant to the Toxic Substances Control Act (TSCA).

During the inspection, violations of the regulations were noted. You should be aware that violations of TSCA may be subject to administrative civil penalties. The following identifies in detail the violations observed during the inspection.

REGULATION - DISPOSAL: 40 C.F.R. § 761.60(d)(1) and (2) states that: (1) Spills and other uncontrolled discharges of PCBs at concentrations of 50 ppm or greater constitute the disposal of PCBs, and (2) PCBs resulting from the cleanup and removal of spills, leaks or other uncontrolled discharges must be stored and disposed of in accordance with 40 C.F.R. § 761.60. Disposal of PCBs in any other manner constitutes the improper disposal of PCBs.

REGULATION: 40 C.F.R. § 761.3 states that oil-filled electrical equipment other than circuit breakers, reclosers, and cable whose PCB concentration is unknown must be assumed to be PCB-Contaminated Electrical Equipment.

VIOLATION ONE: Two General Electric transformers, serial numbers 1374190 and 1735550, that were servicing the pumphouse at the Geiger Reservoir were leaking at the time of the inspection. Although chemical analysis subsequent to the inspection showed both transformers to contain less than 50 parts per million, at the time of the inspection, they were required to be assumed PCB-Contaminated Transformers.

VIOLATION TWO: Oil-staining from the transformers owned by Washington Water Power at Well Site No. 5 was observed on the concrete base underneath the transformers at the time of the inspection. The transformers were assumed to be PCB-Contaminated Transformers at the time of the inspection and chemical analysis subsequent to the inspection confirmed that the transformers were PCB-Contaminated transformers. This release of PCBs from one or more of these transformers constituted the improper disposal of PCBs.

We have letters of August 30, 1988, and September 6, 1988, from Doug Pottratz which enclosed copies of the analytical results of the transformers in questions. We appreciate Mr. Pottratz's prompt attention to this matter. We understand that Washington Water Power took immediate action to initiate cleanup of the spills, perform testing, retrofill the PCB Transformers, and mark all transformers that were not previously marked, even though the issue of ownership was at that time uncertain. It appears clear at this time that Washington Water Power does own these transformers. Upon completion of the cleanup phase, please forward copies of the postcleanup sampling data to EPA. With the receipt of the information documenting adequate cleanup, we will consider this matter closed.

Inquiries and correspondence should be directed to Eileen Hayes, EPA Region 10, 1200 Sixth Avenue, M/S AT-083, Seattle, Washington, 98101; telephone (206) 442-2584.

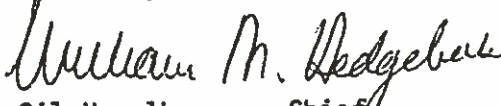
P-563 131 208

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to	MR. FRED SHIOSAKI
Street and No.	Environmental Affairs
P.O. State and Zip Code	Washington Water Power P.O. Box 377 Spokane, WA 99220
Postage	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	09/30/88

Sincerely,

for 
Gil Haselberger, Chief
Toxic Substances Section

<p>● SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.</p> <p>Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. <u>The return receipt fee will provide you the name of the person delivered to and the date of delivery.</u> For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.</p> <p>1. <input checked="" type="checkbox"/> Show to whom delivered, date, and addressee's address. 2. <input type="checkbox"/> Restricted Delivery ↑(Extra charge)↑</p>	
<p>3. Article Addressed to:</p> <p>Mr. Fred Shiosaki, Manager Environmental Affairs Washington Water Power P.O. Box 3727 Spokane, Washington 99220</p>	<p>4. Article Number</p> <p>P-653 131 208</p> <p>Type of Service:</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail</p> <p>Always obtain signature of addressee or agent and <u>DATE DELIVERED</u>.</p>
<p>5. Signature -- Addressee</p> <p>X</p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature -- Agent</p> <p>X</p>	
<p>7. Date of Delivery</p> <p>10/4/88</p>	

ROUTINE AND TRANSMITTAL SLIP

Date

15 sept 88

TO: (Name, office symbol, room number,
building, Agency/Post)

Initials

Date

1. Ms. Eileen Hayes

2. Region X EPA - AT 083

3. 1200 Sixth Ave.

4. Seattle, Wa 98101

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
<input checked="" type="checkbox"/> As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Real property ownership documents for the Electrical Service to our water well annex at Fort George Wright are attached.

SEP 17 1988

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

GARY O. JESPERSEN

92CSG/DEEV

Fairchild AFB, Wa. 99011-5000

Room No.—Bldg.

2451A

Phone No.

(509) 247-5847

5041-102

OPTIONAL FORM 41 (Rev. 7-76)

Prescribed by GSA

FPMR (41 CFR) 101-11.206

USGPO 1983 O-381-529 (315)

A. Wash - 5101

EASEMENT DEED AND BILL OF SALE

The UNITED STATES OF AMERICA, acting by and through the Administrator of General Services under and pursuant to the powers and authority contained in applicable provisions of the Federal Property and Administrative Services Act of 1949 (Public Law 152, 81st Congress; 63 Stat. 377) as amended, and regulations and orders promulgated thereunder (hereinafter designated as "Grantor"), for and in consideration of the sum of Ten Dollars and other good and valuable consideration, does hereby convey and quitclaim to THE WASHINGTON WATER POWER COMPANY, a Washington corporation, (hereinafter designated as "Grantee"), its successors and assigns, an easement described as follows:

18.97 ac.
A permanent easement over the former George Wright Air Force Base, Spokane County, Washington, for the construction, operation, maintenance, repair, removal, or replacement of the existing electrical distribution system and appurtenances herein sold to Grantee, or any replacements thereof, such easement to be 20 feet in width, 10 feet on each side of the centerline of the existing system, and such easement shall include easements for the privately owned feeder lines connecting with the existing system, the areas upon which existing substations are located and the surrounding fenced areas, and all necessary access rights. The existing electrical distribution system is substantially as shown on Drawing 18-02-23 attached hereto and by this reference made a part hereof.

SUBJECT TO:

Rights of way for public road purposes for Government Way, Barksdale Road, and Custer Drive, as granted in Quitclaim Right of Way Deed dated as of August 20, 1961, wherein the United States of America, acting by and through the Administrator of General Services, was grantor and Spokane County was grantee;

Right of way for public road purposes for Rimrock Drive, Houston Road, and Government Way-Trails Road, as granted by Quitclaim Right of Way Deed dated as of March 28, 1962, wherein the United States of America, acting by and through the Administrator of General Services, was grantor and Spokane County was grantee;

Right of way and easement for railroad purposes as granted in Easement for Railroad Right of Way dated September 18, 1961, wherein the United States of America, acting by and through the Administrator of General Services, was grantor and Great Northern Railway Company was grantee;

Easements, liens, reservations, exceptions, or other interests of record or otherwise established..

George Wright Air Force Base is more particularly described as follows:

Beginning at the SW corner of the SE 1/4 of Section 10, Township 23 North, Range 42 East of the Willamette Meridian, Spokane County, Washington, at a stake numbered 1, thence along the south line of said Section 10, running South 89° 15' East, a distance of 2819.7 feet to a

5-28-62

stake numbered 2 and located at the SW corner of the SW 1/4 of Section 11, Township 25 North, Range 42 East of the Willamette Meridian, thence along the south line of said Section 11, running North 89° 54' East a distance of 2646.3 feet to a stake numbered 3, located at the SE corner of said SW 1/4 of Section 11, thence along said south line of said Section 11, running South 88° 33' East a distance of 568 feet to a stake numbered 4 and located at the intersection of the said south line of said Section 11 with the left bank of the Spokane River, thence following said left bank of said Spokane River, at high water mark, a distance of 16,433.1 feet to a stake numbered 5 and located at the South intersection of the East line of Section 3, Township 25 North, Range 42 East of the Willamette Meridian, with said left bank of said Spokane River, at high water mark, thence along said East line of said Section 3, north a distance of 2,182.20 feet to a stake numbered 6, and located at the north intersection of said East line of said Section 3 with said left bank of said Spokane River, thence following said left bank of said Spokane River in a westerly direction, a distance of 5,931.6 feet to a stake numbered 7 and located at the intersection of said left bank of said Spokane River with the west line of said Section 3, thence along said west line of said Section 3, running South 0° 25' west, a distance of 2,662.4 feet to a stake numbered 8 and located at the SW corner of the SW 1/4 of said Section 3, thence along the south line of said Section 3, running South 89° 22' East a distance of 1,328.2 feet to a stake numbered 9, thence South 0° 18' East a distance of 490 feet to a stake numbered 10, thence South 76° 03' East a distance of 187 feet to a stake numbered 11, thence South 41° 03' East a distance of 635 feet to a stake numbered 12, thence South 70° 03' East a distance of 412.1 feet to a stake numbered 13, thence North 55° 0' East a distance of 418.9 feet to a stake numbered 14 and located on the North and South center line of Section 10, Township 25 North, Range 42 East of the Willamette Meridian, thence on said Section line South 0° 11' East a distance of 121.6 feet to a stake numbered 15, thence South 89° 44' East a distance of 205.2 feet to a stake numbered 16, thence South 1° 29' West a distance of 95.1 feet to a stake numbered 17, thence South 26° 21' East a distance of 403.7 feet to a stake numbered 18, thence North 64° 06' East a distance of 178.9 feet to a stake numbered 19, thence South 25° 56' East a distance of 890 feet to a stake numbered 20, thence South 49° 46' East a distance of 60 feet, thence South 51° 48' East a distance of 244.3 feet to a stake numbered 21, thence South 35° 10' West a distance of 46 feet, thence South 32° 31' West a distance of 50 feet, thence South 29° 45' West a distance of 50 feet, thence South 26° 59' West a distance of 50 feet, thence South 24° 13' West a distance of 50 feet, thence South 21° 27' West a distance of 50 feet, thence South 18° 41' West a distance of 50 feet, thence South 15° 55' West a distance of 50 feet, thence South 12° 49' West a distance of 62.4 feet to a stake numbered 22, thence North 89° 08' West a distance of 897.4 feet to a stake numbered 23 and located at the NW corner of the SE 1/4 of Section 10, Township 25 North of Range 42, East of the Willamette Meridian, thence due South on the west line of said SE 1/4 of Section 10, a distance of 2,678.4 feet to the place of beginning.

There is excepted therefrom the following described tract of land:

Elliott Drive (formerly known as Seattle Lake Shore & Eastern Right of Way and as formerly constructed and operated by the Northern Pacific Railway) the City of Spokane owned road right of way, lying in Sections 10 and 11, T 25 N, R 42 E., W. M., in Spokane County, Washington, and more particularly described as:

Commencing at the SE corner of said Section 10; thence N 89° 15' W. along the south line of said Section 10, a distance of 402.9' to the point of intersection of said Section line with the centerline of Elliott Drive being the TRUE POINT OF BEGINNING of the Elliott Drive R/W which is more particularly described as being a strip of land 80' in width, being 40' on each side of that portion of the following described centerline lying within the SE 1/4 of said Section 10; thence N 24° 02' W., a distance of 39.7' to a point; thence on a 4° curve to the left having a radius of 1432.69' a distance of 249.5' through an angle of 10° to a point; thence N 34° 02' W. a distance of 477.8' to a point; thence on a 2° curve to the left having a radius of 2864.93' a distance of 180.8' through an angle of 3° 37' to a point; thence N 37° 39' W. a distance of 292.1' to a point; thence on a 2° 30' curve to the right having a radius of 2292.01' a distance of 572' through an angle of 14° 18' to a point; thence N 23° 21' W. a distance of 370.5' to a point; thence on a 3° curve to the right having a radius of 1910.08' a distance of 490.5' through an angle of 14° 43' to a point; thence on a 6° curve to the right having a radius of 955.366' a distance of 348' more or less, to a point on the East West centerline of said Section 10; thence continuing along said R/W centerline through the NE 1/4 of said Section 10 on a strip of land 100' in width, being 50' on each side of the following described centerline; thence on a 6° curve to the right having a radius of 955.366' a distance of 261.18' to a point; (the last two courses consume a total angle of 38° 20' and a total distance of 639.18'); thence on a 8° curve to the right having a radius of 716.779' a distance of 915.74' through an angle of 73° 12' to a point; thence on a 3° curve to the right having a radius of 1910.08' a distance of 672.30' through an angle of 20° 10' to a point; thence S 56° 56' E a distance of 150', more or less, to the point of intersection of said R/W with Section Line Common to said Sections 10 and 11, said point being the terminus of the 100' portion of right of way of said Elliott Drive; thence continuing through the W 1/2 of said Section 11 along said R/W centerline of Elliott Drive on a strip of land 160' in width, being 35' to the south of and 125' to the north of the centerline of said right of way, S 56° 56' E a distance of 599.5' to a point; thence on a 3° curve to the left having a radius of 1910.08' a distance of 710.7' through an angle of 21° 19' to a point; thence on a 6° curve to the left having a radius of 955.37' a distance of 279' through an angle of 16° 17' to a point; thence continuing on a strip of land 80' in width, being 35' south of and 45' north of the centerline of said right of way, on a 2° curve to the left having a radius of 2864.93' a distance of 366' through an angle of 7° 09' to a point; thence N 78° 09' E, a distance of 297.3' to a point; thence on a 7° curve to the left having a radius of 919.02' a distance of 457.8' through an angle of 32° 01' to a point; thence N 46° 08' E a distance of 194.6' to a point; thence on a 10° curve to the right having a radius of 573.686' a distance of 574.3' through an angle of 57° 20' to a point; thence continuing through a strip of land 100' in width being 50' on each side of the centerline of said right of way S 78° 48' E a distance of 209.6' to a point; thence on an 8° curve to the left having a radius of 716.779' a distance of 829' through an angle of 66° 19' to a point; thence N 34° 15' E a distance of 193' to the end of this centerline description; the above described right of way containing 22.21 acres, more or less.

TO HAVE AND TO HOLD the easement together with all the privileges and appurtenances thereto belonging, unto Grantee, its successors and assigns,

forever, subject to the reservations contained herein.

There are reserved to the United States of America, its transferees and assigns, easements and rights as follows:

A perpetual easement with the right of access thereto for the purpose of construction, operation, maintenance, repair, removal or replacement of the existing communication system, upon, over and across a strip of land 20 feet in width being 10 feet on either side of the center line of said existing system substantially as shown on Drawing 18-02-21 attached hereto and made a part hereof.

A perpetual easement with the right of access for construction, operation, maintenance, repair, removal or replacement of the existing water distribution system upon, over and across a strip of land 20 feet in width being 10 feet on either side of the center line of said existing system substantially as shown on Drawing 18-02-17 attached hereto and made a part hereof.

A perpetual easement with the right of access for construction, operation, maintenance, repair, removal or replacement of the existing sewer system upon, over and across a strip of land 20 feet in width being 10 feet on either side of the center line of said existing system substantially as shown on Drawing 18-02-15 attached hereto and made a part hereof.

A perpetual easement for the operation and maintenance of an existing 20 inch water pipeline and electrical control circuit exits., said easement being a strip of land lying in Sections 10 and 11, Township 25 North, Range 42 East, Willamette Meridian, Spokane County, Washington, said strip of land being 60 feet in width, being 30 feet wide on each side of a line described as follows:

*5.13 ac
Net. land.*

Beginning at a point lying N 89° 15' W, a distance of 1284.7 feet from the SE corner of said Section 10; thence by the following courses and distances: N 51° 59' E, 876.00 feet, N 7° 14' W, 269.20 feet, N 18° 14' W, 258.56 feet, N 24° 35' E, 726.40 feet, N 22° 25' E, 365.30 feet, N 6° 48' E, 508.80 feet, N 40° 14' E, 717.60 feet more or less to the point of terminus of the above described line.

The right of obtaining electrical power service, to be metered at no additional or extra expense to the Government for installation of the meters, to the Government-retained property, located within the former George Wright Air Force Base first above described, and more particularly described as:

NATIONAL GUARD AREA

A parcel of land in the East half of Section 10, Township 25 North, Range 42 East, Willamette Meridian, in Spokane County, Washington, and within the George Wright Air Force Base Military Reservation, described as follows:

1.50 ac.

Beginning on the south line of said Section 10 at a point which is 186.2 feet west of the southeast corner of said Section 10, which point also is on the center line of the Great Northern Railway Co. 100-foot railroad right-of-way; thence northwesterly along said right-of-way center line 2740 feet to the true point of beginning of this description; thence North 51° 43' East, 495.96 feet; thence South 33° 17' East, 650.00 feet; thence South 51° 43' West, 695.00 feet, more or less, to the center line of said railroad right-of-way; thence northwesterly along said

railroad right-of-way center line to the true point of beginning; subject to easements for railroad right-of-way and county road (Government Way) in favor of the Great Northern Railway Company and Spokane County over the westerly 130 feet of said described tract.

AIR FORCE RESERVE AREA

Being a parcel of land enclosing building 601, lying in Section 11, Township 25 North, Range 42 East, Willamette Meridian, Spokane County, Washington and being a portion of the George Wright Air Force Base, described as follows:

Commencing at the Southwest corner of Section 11, Township 25 North, Range 42 East, Willamette Meridian, thence N 40° 16' 10" E, a distance of 1363.2 feet to a point being on the easterly edge of an alley, and the true point of beginning; thence S. 69° 04' 50" W, a distance of 8.00 feet to a point in the center line of said alley; thence in said center line N. 17° 03' 20" W, a distance of 210.90; thence N. 69° 05' 40" E, a distance of 197.90 feet, to a point in the center line of Randolph Road; thence along said center line of said road in a curve, said curve being part of a circle whose center bears S. 66° 08' 20" W, a radius distance of 2088.00 feet, said curve also having a long chord which bears S. 20° 58' 30" E, a distance of 210.40 feet and a central angle of 5° 46' 28" and a length of 210.50 feet; thence leaving said center line of said road, S. 69° 04' 50" W, a distance of 203.30 feet to the true point of beginning.

WATER WELL AREA.

Commencing at the point of intersection of the north line of the Seattle, Lake Shore and Eastern Railway with the west line of said Section 11; thence North 40° 12' East, a distance of 50 feet to the TRUE POINT OF BEGINNING; thence North 40° 12' East, a distance of 170 feet, more or less, to a point on the Reservation Boundary along the southerly bank of the Spokane River; thence South 69° 00' East, a distance of 397 feet; thence South 73° 03' East, a distance of 330 feet; thence North 88° 37' East, a distance of 700 feet; thence South 26° 10' West, a distance of 250 feet; thence South 85° 00' West, a distance of 750 feet; thence northwesterly, along a straight line to the point of beginning.

GEIGER FIELD INSTRUMENT LANDING SYSTEM OUTER MARKER SITE

Beginning at a point lying South 45° 00' East, a distance of 993.19 feet from the northwest corner of the southwest quarter of said Section 12; thence by the following courses and distances:

South 44° 30' East, 800.00 feet;
North 45° 30' East, 65.00 feet;
North 44° 30' West, 80.00 feet;
thence South 45° 30' West, 65.00 feet to the point of beginning.

CEMETERY

1.20 ac
Beginning at a point lying North 38° 49' West a distance of 1750 feet, more or less, from the southeast corner of the northeast quarter of said Section 10; thence westerly, along the existing fence line, 250 feet, more or less, to the southwest corner thereof; thence northeasterly, along said fence line, 330 feet, more or less, to the northwest corner thereof; thence northeasterly, along said fence line, 90 feet, more or less to the northeast corner thereof; thence southeasterly, along said fence line, 300 feet, more or less, to the point of beginning.

For the same consideration the Grantor grants, bargains, sells and assigns to the Grantee, without representation or warranty either express or implied, the electrical distribution system located within the former George Wright Air Force Base, described above, including poles, transformers, conductors, insulators, fencing, appurtenant accessories, and any and all sub-stations and structures appurtenant to the electrical system and the 13 KV feeder lines extending approximately 3370 feet easterly of the sub-station to its connection with source of power, but excluding all lead in service wires servicing individual buildings and any and all installations therein. The electrical distribution system is substantially as shown on Drawing 18-02-23 which is attached hereto.

Grantee agrees that, upon proper application to it, Grantee will provide electrical service to all portions of the former George Wright Air Force Base presently served by the electrical distribution system at rates commensurate with rates charged for similar service in the Spokane area.

The property transferred herein was both duly determined to be surplus to the needs and requirements of the United States of America and assigned to General Services Administration for disposal pursuant to authority contained in the said Federal Property and Administrative Services Act as amended, and applicable orders and regulations promulgated thereunder.

IN WITNESS WHEREOF, Grantor has caused this instrument to be executed as of May 28, 1962.

UNITED STATES OF AMERICA
Acting by and through the
Administrator of General Services

(GSA SEAL)

By /s/ C. E. Ocamb
Chief, Real Property Division
Utilization and Disposal Service

STATE OF WASHINGTON)

COUNTY OF KING)

) ss

On this 18th day of June, 1962, before the undersigned, a Notary Public in and for the State of Washington, personally appeared C. E. Ocamb, to me known to be the Chief, Real Property Division, Utilization and Disposal Service, Region 10, General Services Administration, and to me known to be the individual described in and who executed the foregoing instrument and who under oath stated that he was duly authorized, empowered and delegated by the Administrator of General Services to execute the said instrument and acknowledged the foregoing instrument to be his free and voluntary act and deed, acting for and on behalf of the Administrator of General Services, acting for and on behalf of the United States of America, for the uses and purposes therein mentioned.

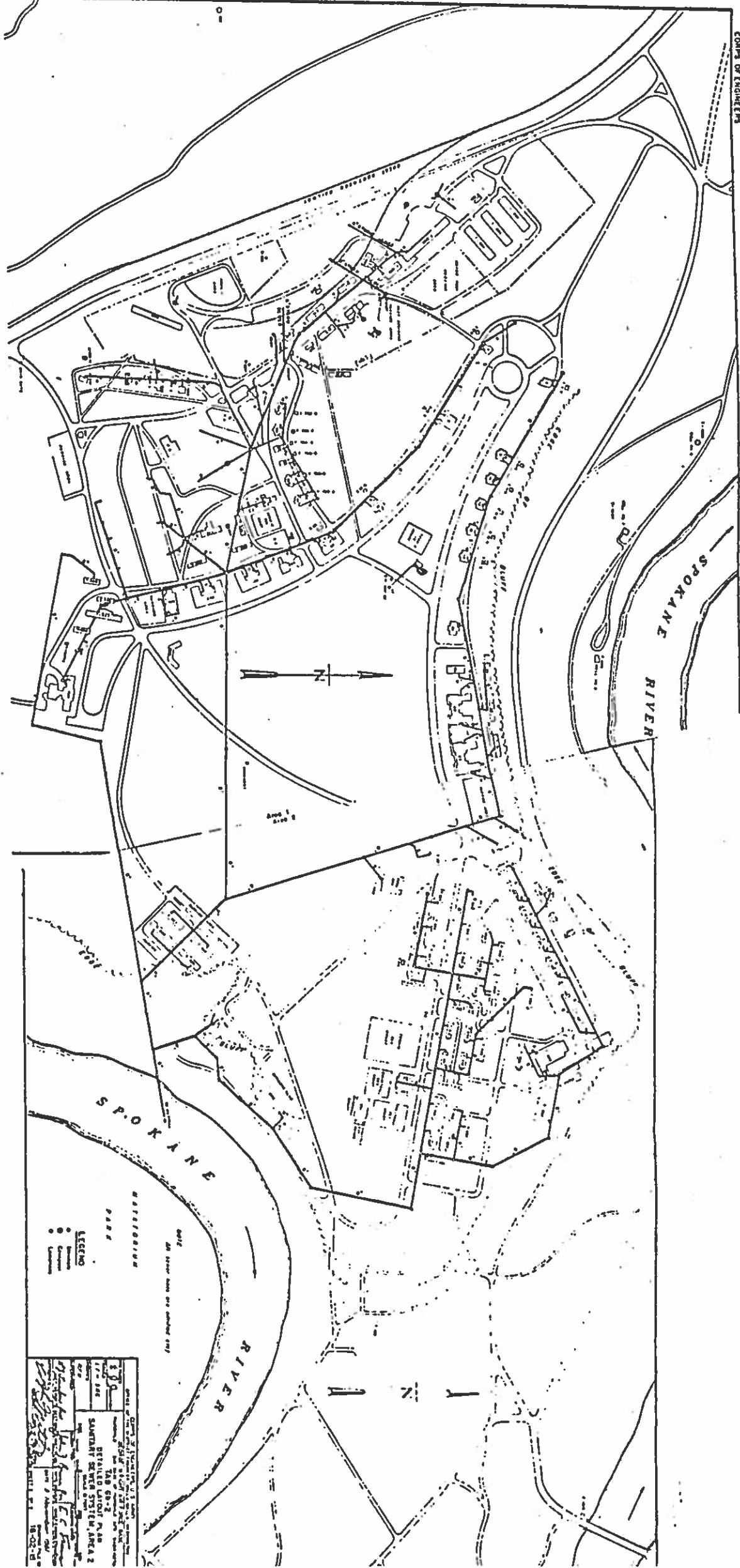
IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate above written.

/s/ Robert Douglas Green

Notary Public in and for the State of
Washington, residing at Auburn

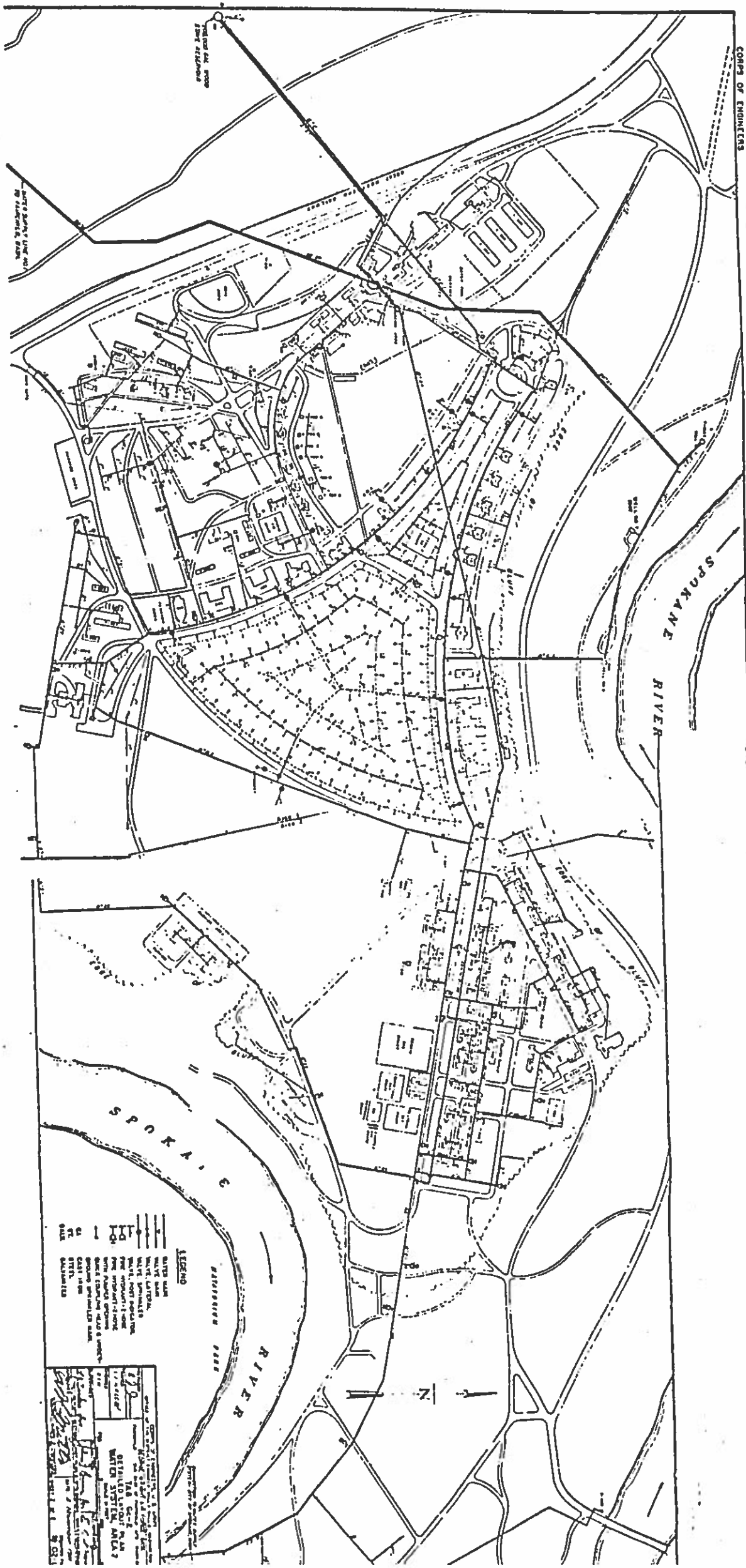
(Notarial Seal)

COMP. OF ENGINEERS

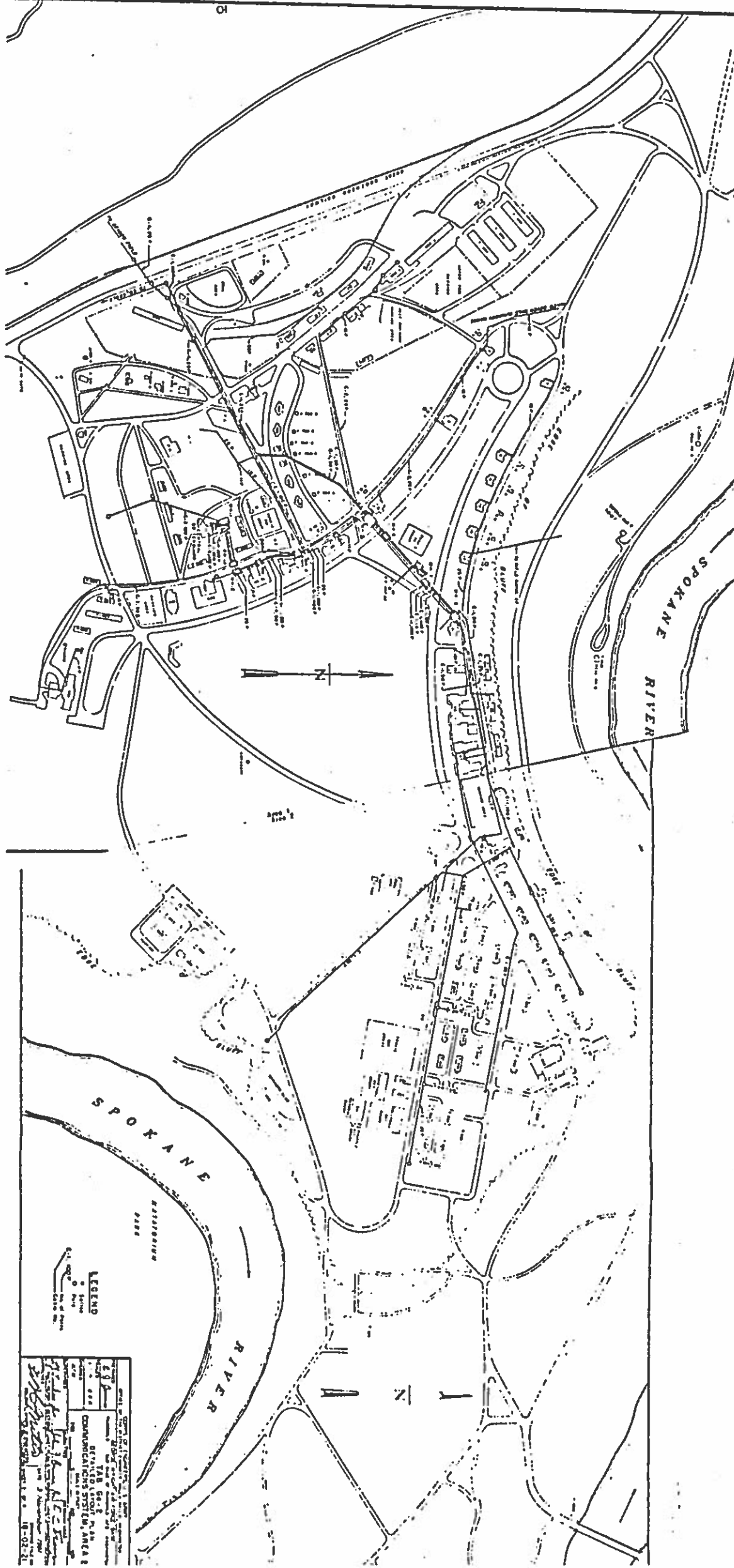


LEGEND
• Sewer
• Manhole
• Catch Basin

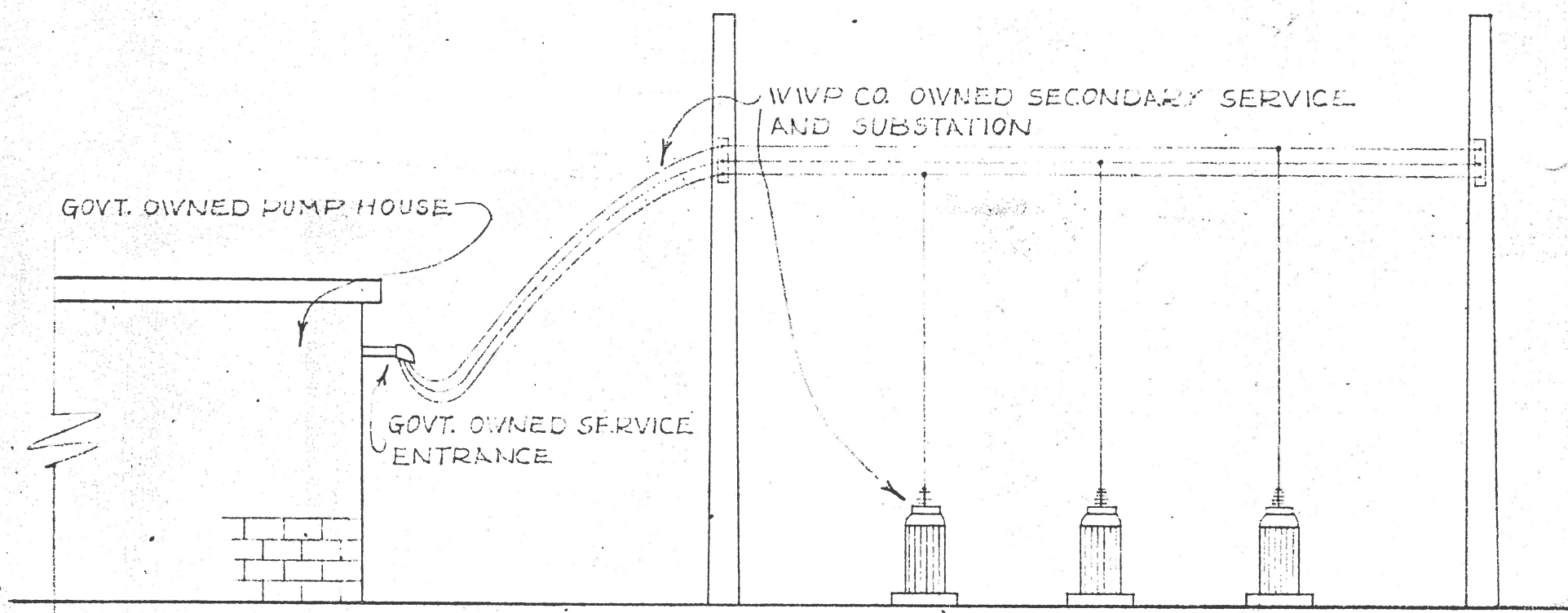
DATE	10-1-68
BY	J. E. Smith
CHECKED BY	J. E. Smith
APPROVED BY	J. E. Smith
SCALE	1" = 100'
PROJECT	SANITARY SEWER SYSTEM, AREA 2
LOCATION	Area 2
DATE OF COMPLETION	10-1-68



CORPS OF ENGINEERS

[illegible]

0948
 10-7-67
 10-7-67

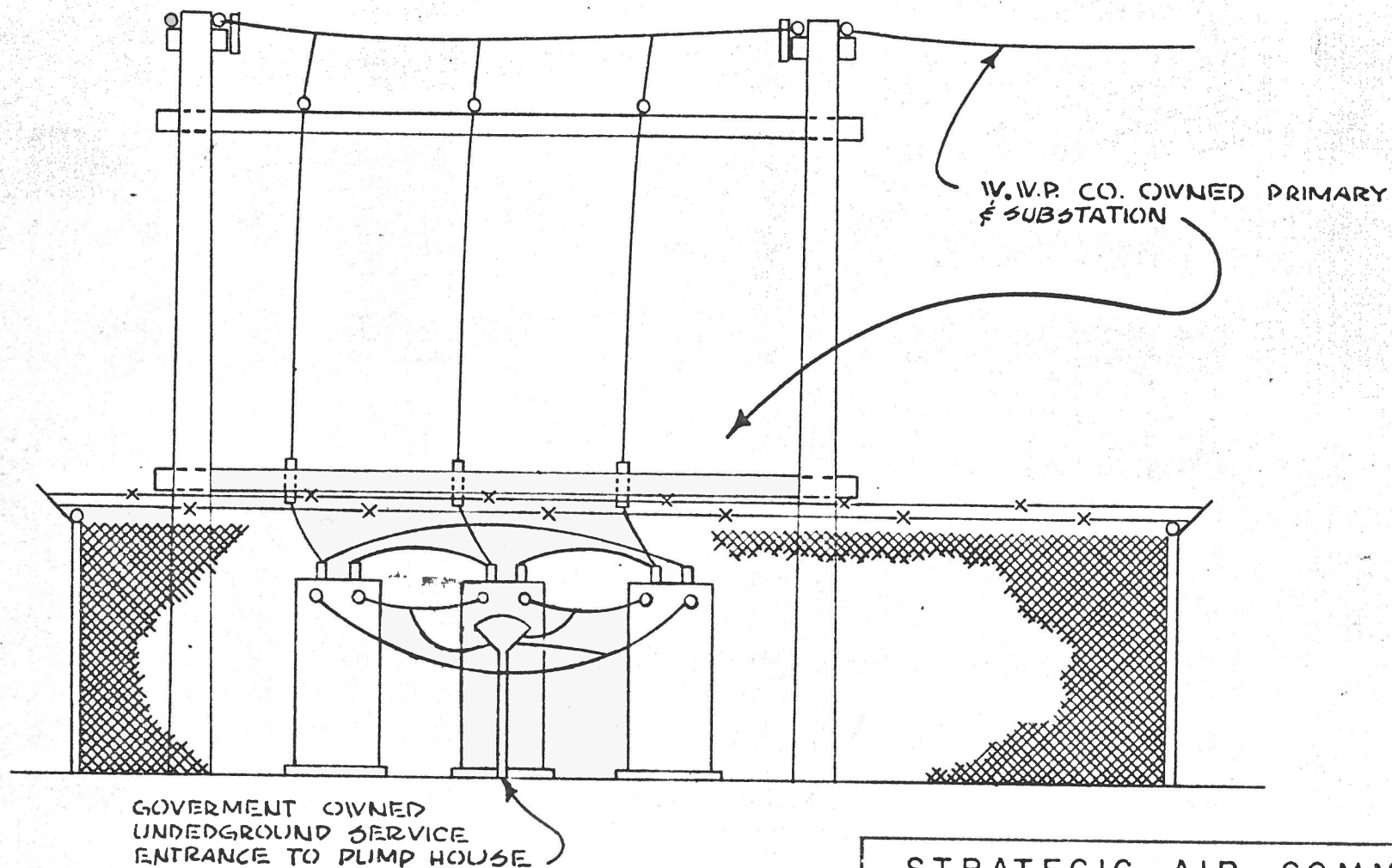


STRATEGIC AIR COMMAND		
FAIRCHILD A. F. B. WASHINGTON		
WATER PUMPING STATION NO. 5		
FORT GEORGE WRIGHT		
SCALE:		PROJECT NO.
DRAWN:	SUBMITTED:	APPROVED:
CHECKED:	RECOMMENDED:	FCD E-262
DATE:		

Attached to and made a part of Contract Nr. AF 45(613)-1-32-Exhibit A-1-2

F45613-67-C-0128

3 OF 4



STATION NO. 7
NO SCALE

F45613-67-C-0128

Attached to and made a part of Contract No. ~~A-45(613)-4132~~ - Exhibit A-1-4

STRATEGIC AIR COMMAND <small>ARCHIE A F B WASHINGTON</small>		
WATER PUMPING STATION NO. 7 FORT GEORGE WRIGHT		
SCALE:	PROJECT NO.	
DRAWN: OGERTELLO	SUBMITTED:	APPROVED:
CHECKED:	RECOMMENDED:	
DATE:		FCD E-262
4 OF 4		

ELECTRIC SERVICE SPECIFICATIONS

DATE
1 July 1978

1. PREMISES TO BE SERVED

Water Wells 5, 6 and 7 - Fort George Wright

WWP Co. No. 0332-03751

2. POINT OF DELIVERY OF SERVICE

From Washington Water Power Company owned substations at each of the three pumphouses

3. ESTIMATED SERVICE REQUIREMENTS (The Government is in no way obligated to use nor is it restricted to the following estimated requirements.)

A. MAXIMUM DEMAND	B. MONTHLY CONSUMPTION	C. ANNUAL CONSUMPTION	D. ANNUAL COST
1,000 KW	208,333 KWH	2,500,000 KWH	\$37,447.32

4. DESCRIPTION OF ELECTRIC SERVICE TO BE SUPPLIED BY CONTRACTOR

A. PHASE	B. NR OF WIRES	C. Check appropriate box - If not 60 cycle, check OTHER and describe in Item 6 below	D. TYPE
<input type="checkbox"/> SINGLE <input checked="" type="checkbox"/> THREE	<input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4	<input checked="" type="checkbox"/> 60 CYCLE <input type="checkbox"/> OTHER	<input type="checkbox"/> PRIMARY <input checked="" type="checkbox"/> SECONDARY

E. VOLTAGE CONNECTION	F. LINE REGULATION
PRIMARY 13.2 KV Delta SECONDARY 440 Delta	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO \pm N/A %

5. SWITCHING AND PROTECTIVE APPARATUS

OWNERSHIP	LIGHTNING ARRESTERS	FUSED DISCONNECTS	OIL CIRCUIT BREAKERS	INTERRUPTING CAPACITY
<input type="checkbox"/> GOVERNMENT <input checked="" type="checkbox"/> CONTRACTOR	Expulsion TYPE	Open TYPE	N/A TYPE	2,000 Amp KVA

OWNERSHIP	LIGHTNING ARRESTERS	FUSED DISCONNECTS	OIL CIRCUIT BREAKERS	INTERRUPTING CAPACITY
<input type="checkbox"/> GOVERNMENT <input checked="" type="checkbox"/> CONTRACTOR	None TYPE	None TYPE	None TYPE	None KVA

H. SWITCHING STRUCTURE	I. SUBSTATION STRUCTURE
OWNERSHIP <input type="checkbox"/> GOVERNMENT <input checked="" type="checkbox"/> CONTRACTOR TYPE <input type="checkbox"/> STEEL <input checked="" type="checkbox"/> WOOD	OWNERSHIP <input type="checkbox"/> GOVERNMENT <input checked="" type="checkbox"/> CONTRACTOR TYPE <input type="checkbox"/> STEEL <input checked="" type="checkbox"/> WOOD

J. TRANSFORMERS

NUMBER OF TRANSFORMERS AND KVA CAPACITY OF EACH	TYPE CONNECTION (Delta or Wye)	TYPE
THREE PHASE SINGLE PHASE 12-100 KVA	PRIMARY Delta SECONDARY Delta	<input type="checkbox"/> CSP <input checked="" type="checkbox"/> STANDARD IMPEDANCE 2.0 %

K. TECHNICAL DATA (Substation)

REGULATORS	TRANSFORMER TAP CHANGING UNDERLOAD	OVERLOAD CAPACITY SUBSTATION TRANSFORMERS
NR TYPE KW	<input type="checkbox"/> YES <input type="checkbox"/> NO	KVA RATING OVERLOAD RATING NR OF HOURS TOTAL KVA

L. ATTACHED AS EXHIBIT *See Below IS AN 8" X 10 1/2" (OR MULTIPLE THEREOF) AREA MAP SHOWING TRANSMISSION AND DISTRIBUTION LINES AND POINT(S) OF DELIVERY. *Exhibits A-1-1, A-1-2, A-1-3, A-1-4M. ATTACHED AS EXHIBIT IS AN 8" X 10 1/2" (OR MULTIPLE THEREOF) ONE LINE DIAGRAM PROPERLY IDENTIFYING THE FACILITIES INVOLVED.

N. METERING AND BILLING

VOLTS AT WHICH SERVICE WILL BE MEASURED	WATT HOUR	DEMAND	METER CONSTANTS
13.2 KV	3 Phase	<input type="checkbox"/> RECORDING <input checked="" type="checkbox"/> INDICATING	WATT HOUR 1200 DEMAND 1200

O. ADDITIONAL SPECIFICATIONS

a. Rate Schedule No. 32, Pumping Service, shall apply to this specification subject to General Provisions 2 and 3 of contract.

b. In addition to the monthly charges for power and energy specified above, the Government will also pay to the contractor at the end of each billing month of the term of usage, a charge in the amount of \$140.00 to reimburse the contractor for providing, owning, maintaining and operating facilities required to convey, (Con'd)

U.S.
0948
FORT COCKER

Exhibit A-1

Attached to and made part of Contract No F45613-67-C-0128 - P018

SAC - OAFB, Nebraska

transform and distribute power and energy from the point of metering to the points of delivery at each of the three water pumping facilities as shown and specified on Drawing FCD E-262, Sheets 1 through 4, attached as a part of this Exhibit to the contract. Should the Government abandon one or more of the pumping facilities, the contractor shall remove such of his facilities as are no longer needed at his own expense and shall continue to serve the remaining pumping facility(ies) under the same terms and rates as heretofore agreed, except that an equitable adjustment will be made in the Use of Facility Charge specified above.

EL
PREMISES TO BE SERV
Spokane Inter
1. POINT OF DELT
From Wa
3. ESTIM
estimate
A. MA

TELEPHONE CALL RECORD

ROUTING

DATE: 9/14 TIME IN: 8:55 TIME OUT: 4:05

A) CALL FROM: Earl J. Peterson

TITLE : _____

LOCATION AND PHONE NO. : Farrchild Air Force Base

B) CALL TO : Fileen Hayes

TITLE : POB Case Reviewer

LOCATION AND
PHONE NO. : PTS B 2-2584

CASE FILE

ENFORCEMENT

SENSITIVE

ACTION NEEDED

[illegible]

SUMMARY OF CALL:

Wanted to know status of crop report
Explained we were meeting w/ Doug Patterson at 8:00 in the morning

Mr. Gerspenson stated he had documentation proving
Fairchild AED did not own nor have responsibility for
transformer ingestion. I asked him to send me copies
of those documents. Said he would mail in the
morning.

Pray E. Hays
(SIGNATURE)



Washington Water Power

Fred A. Shiosaki
Manager
Environmental Affairs

September 6, 1988

SEP 06 1988

Ms. Eileen Hayes
Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Dear Ms. Hayes:

In response to our phone conversation on Thursday, September 1, I am sending you a copy of a map showing transformer locations within the fenced areas of the FAFB water pumping station site. The actual distance of pump station no. 5 transformers to the river is approximately 150 feet (45 meters).

We are still awaiting written laboratory results on soil samples. I indicated to you that the phoned-in results showed no detectable PCBs at pump station #7, pump station #6 and the 2 overhead transformers on poles. Samples taken inside pump station no. 5 next to the concrete pad did show PCB levels ranging from 3 to 12 ppm with one sample at 42 ppm.

Final cleanup cannot be accomplished in pump station no. 5 without an electrical shutdown. This is because of the danger of working in tight quarters around energized conductors. Because of the hot summer weather and drought conditions, FAFB does not want to shut down the pumps right now.

In coordination with Lt. Brown and Chet Monczki of FAFB, a shutdown is being scheduled within the next 2 weeks when temperatures are expected to cool. During this time we will go in and retrofil the transformers and conduct final cleanup.

I hope this additional information clarifies the cleanup status. Please call me at (509) 482-4499 if questions arise. We will continue to communicate on our resolution of the problem.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Doug K. Pottratz', followed by a large, stylized flourish.
Douglas K. Pottratz

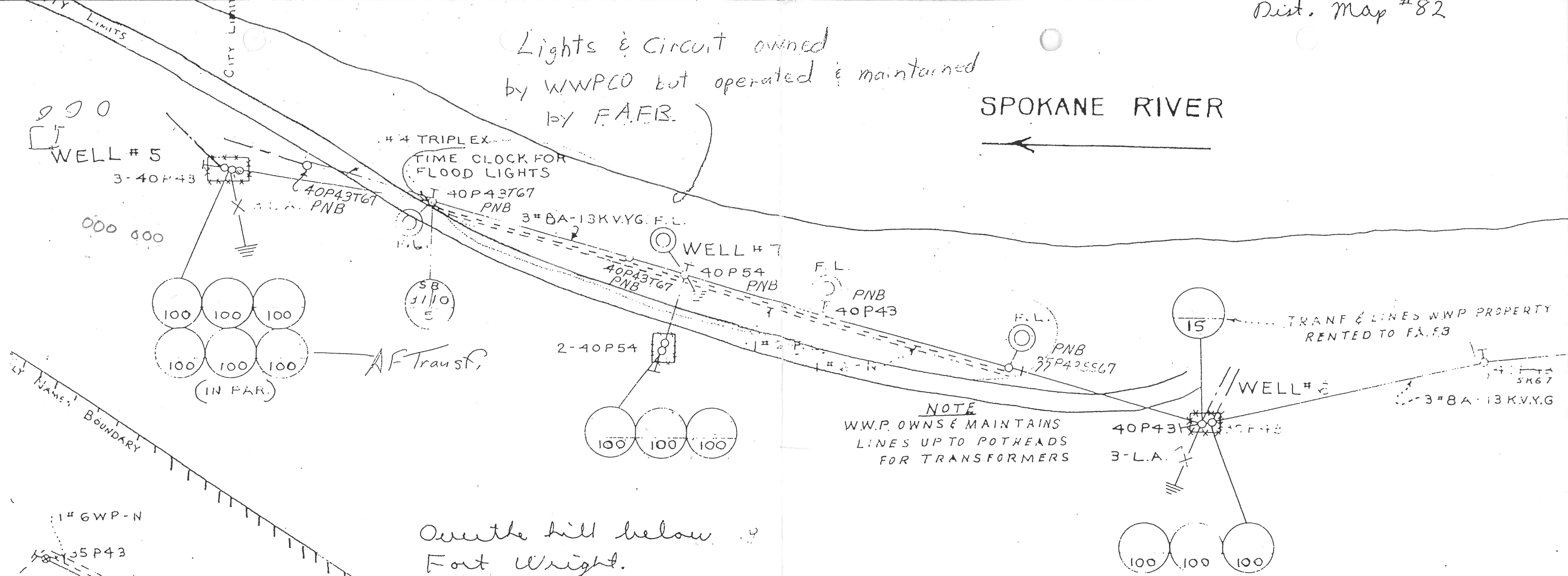
pjl

cc: Jan Mettler WWP
Tom Mason WWP
Fred Shiosaki WWP
Gary Gespersion FAFB
Chet Monczki FAFB
Bill Purvis FAFB

Attachment

Lights & Circuit owned
by WWPCO but operated & maintained
by F.A.F.B.

SPOKANE RIVER



Over the hill below
Fort Wright.
Look for any
indication of ownership.

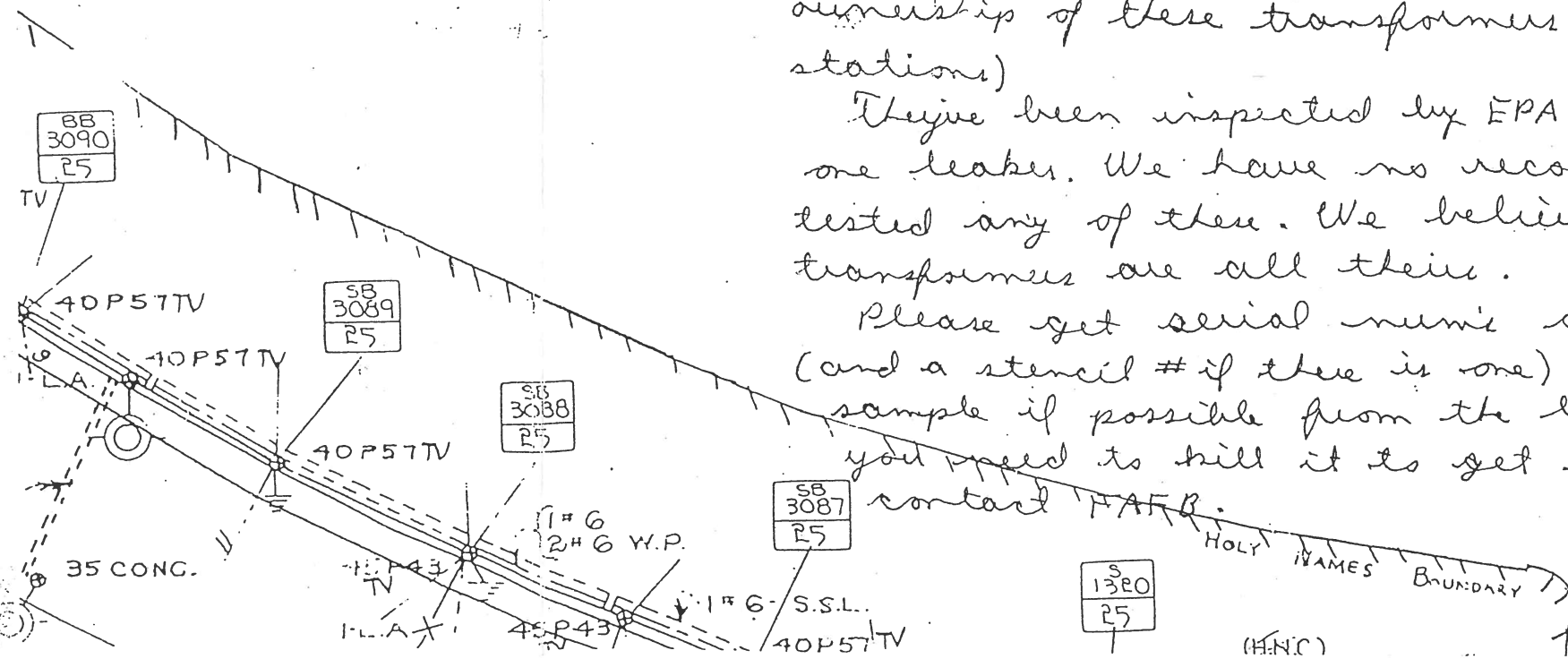
MESSAGE

To Tam Date 6-21 Time 11
 Caller Gary Jespersen
 Phone () 247-5847
 Area Code Number Extension

URGENT	Returned Call	Please Call
Wants To See You	Stopped By	Will Call Back

Re: Fairchild Wells
I will be at lunch from 12 to 1.

By



Dan

We are meeting with FAFB about ownership of these transformers (3 small stations)

They've been inspected by EPA units found one leak. We have no record of having tested any of them. We believe that the transmitters are all theirs.

Please get serial num's of all 12 trans.
(and a stencil # if there is one) and get a
sample if possible from the leaking one - if
you need to bill it to get the sample till
contact HAFB.

Jan

482-46911210ACSR-N

6/21/88

copy
Doug

12/25/88

ABC LABORATORIES, INC.
EAST 4922 UNION AVENUE
SPOKANE, WA 99212
509-534-0161

REPORT TO: Washington Water Power Company
P. O. Box 3727
Spokane, WA 99220

LAB NO: 31761-88
DATE: 8-30-88
DATE REC'D: 8-23-88
P.O.*


ATTN: Betty Riesenbergl

DESCRIPTION: Perform analysis for Polychlorinated Biphenyl's (PCB's) on
submitted samples.

DETECTION LIMITS: 1 ppm ND: Not Detected

SAMPLE ID	AROCLOR		
	1242	1254	1260
Well #5 2335024	ND	ND	ND
Well #5 7514289	ND	ND	3
Well #7 1961-1	ND	ND	<1
Well #7 1961-5	ND	ND	<1
Well #6 7222335	ND	ND	<1
Well #6 9847209	ND	ND	ND
Well #6 7222334	ND	ND	<1
Well #6 7222333	ND	ND	2
Sample #2 rerun	ND	ND	7
Sample #3 rerun	ND	ND	5
Sample #4 rerun	ND	ND	9
Sample #8 rerun	ND	ND	<1
*5 7514291	ND	ND	12
*5 7514286	ND	ND	42

Respectfully submitted
ABC LABORATORIES, INC.


W.E. Burkhardt
Manager

TELEPHONE CALL RECORD

DATE: 9/4/88 TIME IN: 2:00 TIME OUT: 2:15

ROUTING

A) CALL FROM: Elpen Hayes

TITLE : PCB Case Reviewer.

X CASE FILE

LOCATION AND
PHONE NO. : PTSB - 2-2584

ENFORCEMENT
SENSITIVE
ACTION NEEDED

B) CALL TO : Doug Pottraly

TITLE : ~~Water~~ ENV Engineer

LOCATION AND
PHONE NO. : Washington Water Power, Spokane WA

XXXXXXXXXXXXXXXXXXXXXXX

SUMMARY OF CALL:

Re: Letter received from WWP 9/1/88.

Q. low area identified in the as well site #5. The area inspection report refers to a b being 150 ft from Spokane River.

A. Think so - will send map that shows location of each Transformer & test results.

3 Was pre-cleanup sampling done.

A: yes. Soil samples from around base of pad. Results are enclosed but will mail w/ map. Samples showed 42 ppm next to base and 6-8 ft away 3412 ppm respectively.

Fanchild will shut down pump station 5 next Tuesday for purpose of refilling, testing & more extensive clean-up. This is the main power source for Fanchild.

Mr. Partridge stated that due to the proximity of wires to the concrete base it is very dangerous & difficult to do anything while station is in operation.

Because of the factors they will encapsulate pads and
begin soil removal as required but proper excavation may
take some time. He indicated that he eventually hopes the
station will be replaced (2-3 years) and then more extensive clean-up
(continued on back) M. E. L. Hume

M. E. Dwyer
(SIGNATURE)



Washington Water Power

Fred A. Shiosaki
Manager
Environmental Affairs

August 30, 1988

SEP 1 1988

RECEIVED BRAC

Ms. Eileen Hayes
Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Dear Ms. Hayes:

This letter is in response to your August 23, 1988 request for information and records regarding the leaking transformers at the Fairchild Air Force Base (FAFB) water pumping station near the Spokane River. The presence of leaking transformers was apparently made known to you as a result of a multi-media inspection conducted at FAFB and associated facilities on or about June 6, 1988.

The Washington Water Power Company (WWP) became aware of the leaking transformers on June 20, 1988 as a result of a phone call from FAFB. At that time WWP believed that the transformers were owned by FAFB. In a recent meeting between WWP and FAFB at the pump station, the issue of ownership was still uncertain. Both parties are continuing to research their records to resolve this problem. In spite of this ownership question, WWP took immediate action to initiate clean-up of the transformers that had leaked at one time and sample the oil. Attached are the laboratory results of all the transformers on the pumping station site and 2 transformers that are WWP transformers at the reservoir site (near the airport). All transformers which were not previously tagged or marked according to PCB concentration are now marked. All transformer name plates had the word "oil". Also attached to this letter are recent service and inspection records and PCB equipment record forms.

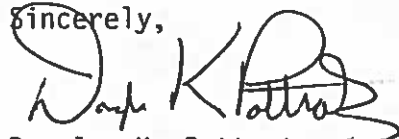
The three (3) PCB transformers at well site No. 5 are marked with M_L labels and are not leaking. Quarterly inspection sheets have been initiated.

Five (5) of the nine (9) PCB-contaminated transformers showed evidence of old leaks, which were observed by the EPA inspectors. None of these transformers were actively leaking at the time samples were taken. No oil had run off the surface of the transformers for three (3) of the transformers. Two (2) transformers in pump station No. 5 did have old oil which had run off the transformer onto the concrete pad. All PCB-contaminated transformers that had old leaks have either been cleaned up or are in the process of final cleanup or encapsulation (in the case of the concrete pad).

The pump station site is a restricted access area. The transformer substations are small in size and are also restricted access within the site.

We will keep EPA apprised of the cleanup status, and the plans for transformer changeout and disposal or retrofit.

Sincerely,



Douglas K. Pottratz
Environmental Engineer

pjl

Attachments

cc	Fred Shiosaki	WWP
	Rick Vermeers	WWP
	Jan Mettler	WWP
	Gary Gespersion	FAFB
	Bill Purvis	FAFB

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4630 PACIFIC HIGHWAY EAST, SUITE B-14 • TACOMA, WASHINGTON 98424 • TELEPHONE (206) 922-2310

Report To: Washington Water Power

Date: August 2, 1988

Report On: PCB in Oil

Lab No: A 3747-10

IDENTIFICATION:

Samples submitted on July 28, 1988

C-695

PO880223

Site: SPOKANE LINE FAFB Pumping Station

7620-480Δ

ANALYSIS:

Line built 1943

14 - FAFB Pump Sta

5 - FAFB Reservoir

Airport & Spotted

Laboratory
Sample No.

Client
Identification

PCB Type

PCB, mg/kg

56 100KVA 1961-1 ✓

1260

97

57 " 1961-5 ✓

1260

424

58 " 1961-7 ✓

1260

240

500/13.2Y - 300/4185Y { 59 30 250KVA 1374190 ✓ - GEIGER RES:
60 " " 1735550 ✓ - GEIGER RES

1260

4.1

1260

2.5

61 100KVA 6912141 ✓ #5

1260

585

62 " 6912147 ✓

1260

807

63 " 6912149 ✓

1260

807

64 100KVA 7222333 ✓ #6

1260

305

65 " 7222334 ✓

1260

125

66 " 7222335 ✓

1260

23

67 7335024 ✓ #5

1260

300

68 100KVA 7514286 ✓

1260

434

69 " 7514289 ✓

1260

462

70 " 7514291 ✓

1260

421

71 9847209 ✓ #6

1260

3.4

Well #7

SPOTTED RD & AIRPORT DR.

Well #5

Well #6

WELL #5

15KVA Pole mount

SOUND ANALYTICAL SERVICES

Brent HEPNER
BRENT HEPNER

DAN GENERAL ORDER WORK ORDER 3478

W. U. 3478

DATE 8/5/88

ADDRESS A-1 SPOTTED RD. AIRPORT DR. (Street) (Town) DATE 8/5/88

NAME ROUTE

DATE TO EXECUTE AM PM FOLIO

Street Light Out Wires Bare Wire Down Low Voltage Chubs Loose

Transformer Out Lights Out Wires In Trees Repair Meter Service Slack

Meter No. and Size Meter Reading

Meter Location

NEW SERVICE Gas Size Length B.T.U. Press.

Location of Main

Remarks Please - Wipe off oil with solvent & tag transformer ASAP. Call Potratz before you go if possible - 44995

By MBETLER

WORKMAN'S REPORT: *Dan* CHARGE NO. CHG.

I cleaned around the bottom of A and installed PCB Tag on these two A's

Completed remainder 8/11/88 DTM

		PRN NO.	COUNTY		CODE AREA NO.	
STREET BLACKTOP	Sq. Ft.	W. O.	ACCOUNT		Dept. or Div.	Loc.
			Main	Sub		
SIDEWALK CONCRETE	Sq. Ft.					
LENGTH OF PIPE UNDER PAVING	Ft.					
TOTAL MAN HOURS					TOTAL	

Workman's Signature *Tom Williams* Date Completed 8-11-88

CES, INC.

TELEPHONE (206) 922-2310

August 2, 1988

A 3747-10

14 - F4 Wt Pump etc

1 - F4B Reservoir

Airport & Spotted

PCB, mg/kg

97

424 } Well #7

240

4.1 } SPOTTED RD & AIRPORT DR.

2.5

585

807 } Well #5

807

305

125 } Well #6

23

300 5KVA Pole mount

434

452 } WELL #5

421

3.4 15KVA Pole mount

SOUND ANALYTICAL SERVICES

Brent HEPNER

BRENT HEPNER

Rev. 8/7/87

WWP Storage No. _____

PCB EQUIPMENT DISPOSAL RECORD

Originator: (District) SPOKANE Bill To: _____
 By: METTLER

Test Data: PCB 807 ppm Lab. Name Sound ANAL Lab. Date 08/02/88
 PCB Wt. _____ kg Lab. No. A 3747-10

PCB CLASSIFICATION:

A ☐ PCB Contaminated Transformer
 50 to <500 ppm

B ☒ PCB Transformer \geq 500 ppm

C ☐ Oil 50 to <500 ppm

D ☐ Liquid Mineral Oil \geq 500 ppm

E ☐ PCB Contaminated Capacitor
 50 to <500 ppm

F ☐ PCB Capacitor \geq 500 ppm

G ☐ Other Equipment _____
☐ Regulator ☐ OCB ☐ Recloser

H ☐ Debris _____

***** PCB BUILDING ONLY *****

* In Storage for Disposal _____/_____/_____
 * Spokane

* ☐ Equipment Full of Oil

* ☐ Equipment Drained

* ☐ Oil pumped to:

* Drum No. Gal.

* _____

* _____

* _____

* _____

* _____

* ☐ Drum of oil from:

* A# Ser/Sten No. Gal. ppm

* _____

* _____

* _____

* _____

* _____

* ☐ Other _____

* _____

* ☐ Equipment in drum

* ☐ 85 gal.

* ☐ 55 gal.

* Size L _____ in.

* W _____ in.

* H _____ in.

* _____

* _____

* Shipping Wt. _____ lbs.

EQUIPMENT INFORMATION:

Stencil No. NONE

Serial No. 6912147

Mfg.

Pri. Volts 7620 Sec. Volts 480

Size 100 kVA

Est. Gallon Oil _____

Location FAFB WELL #5 FT WRIGHT

Town SPOKANE

In Service 8/11/88

Retrofilled _____

Chemically Treated _____

Removed for Disposal _____

Shipped to Spokane _____

FAFB WELL #5

BELOW FT WRIGHT

DISPOSAL DATES, ETC. (Stores & Purchasing ONLY)

Shipped for Disposal _____/_____/_____

Received at Disposal site _____/_____/_____

Incineration _____/_____/_____

Burial _____/_____/_____

Reclassified _____/_____/_____

Carrier _____

Operator _____

Location _____

Location _____

Contractor _____

Rev. 8/7/87



WP Storage No. _____

TAGGED BY
WILLIAMSON
8/11/88PCB EQUIPMENT DISPOSAL RECORDTo
8/11/88Originator: (District) SPOKANE
By: METTLER

Bill To: _____

Test Data: PCB 585 ppm Lab. Name SOUND ANAL Lab. Date 8 / 2 / 88
PCB Wt. _____ kg Lab. No. A-3747-10

PCB CLASSIFICATION:

- A ☐ PCB Contaminated Transformer
50 to <500 ppm
- B ☒ PCB Transformer ≥ 500 ppm
- C ☐ Oil 50 to <500 ppm
- D ☐ Liquid Mineral Oil ≥ 500 ppm
- E ☐ PCB Contaminated Capacitor
50 to <500 ppm
- F ☐ PCB Capacitor ≥ 500 ppm
- G ☐ Other Equipment _____
☐ Regulator ☐ OCB ☐ Recloser
- H ☐ Debris _____

***** PCB BUILDING ONLY *****

* In Storage for Disposal _____/_____/_____
* Spokane* ☐ Equipment Full of Oil* ☐ Equipment Drained* ☐ Oil pumped to:

* Drum No. Gal.

* _____

* _____

* _____

* _____

* _____

* ☐ Drum of oil from:

* A# Ser/Sten No. Gal. ppm

* _____

* _____

* _____

* _____

* _____

* ☐ Other _____

* _____

* ☐ Equipment in drum* ☐ 85 gal.* ☐ 55 gal.

* _____

* Size L _____ in.

* W _____ in.

* H _____ in.

* _____

* Shipping Wt. _____ lbs.

EQUIPMENT INFORMATION:

Stencil No. NONESerial No. 6912141

Mfg.

Pri. Volts 7620 Sec. Volts 480Size 100 kVA

Est. Gallon Oil _____

Location FAFB WELL #5 FT WRIGHTTown SPOKANEIn Service 8 / 11 / 88

Retrofilled _____

Chemically Treated _____

Removed for Disposal _____

Shipped to Spokane 8 / 11 / 88

FAFB WELL #5

BELOW FT WRIGHT

DISPOSAL DATES, ETC. (Stores & Purchasing ONLY)

Shipped for Disposal _____/_____/_____

Received at Disposal site _____/_____/_____

Incineration _____/_____/_____

Burial _____/_____/_____

Reclassified _____/_____/_____

Carrier _____

Operator _____

Location _____

Location _____

Contractor _____

Originator: (District) SPOKANE Bill To: _____
By: METTLER

Test Data: PCB 807 ppm Lab. Name SOUND ANAL Lab. Date 08/02/88
PCB Wt. kg Lab. No. A 3747-10

***** PCB BUILDING ONLY *****

- A ☐ PCB Contaminated Transformer
50 to <500 ppm
- B ☒ PCB Transformer ≥ 500 ppm
- C ☐ Oil 50 to <500 ppm
- D ☐ Liquid Mineral Oil ≥ 500 ppm
- E ☐ PCB Contaminated Capacitor
50 to <500 ppm
- F ☐ PCB Capacitor ≥ 500 ppm
- G ☐ Other Equipment _____
☐ Regulator ☐ OCB ☐ Recloser
- H ☐ Debris

- In Storage for Disposal _____/_____/_____
 Spokane
☐ Equipment Full of Oil
☐ Equipment Drained
☐ Oil pumped to:
 Drum No. Gal.

☐ Drum of oil from:
 A# Ser/Sten No. Gal. ppm

☐ Other _____

Stencil No. NON E
Serial No. 6912149 Mfg. _____
Pri. Volts 7620 Sec. Volts 480
Size 100 kVA
Est. Gallon Oil _____

- * ☐ Equipment in drum
* ☐ 85 gal.
* ☐ 55 gal.
*
* Size L _____ in.
* W _____ in.
* H _____ in.

Location FAFB WELL #5 FT WRIGHT
Town SPOKANE

* Shipping Wt. _____ lbs.

In Service	8	11	88
Retrofilled			
Chemically Treated			
Removed for Disposal			
Shipped to Spokane			

FAFB WELL #5
BELOW FT WRIGHT

DISPOSAL DATES, ETC. (Stores & Purchasing ONLY)

Shipped for Disposal	____/____/____	Carrier	_____
Received at Disposal site	____/____/____	Operator	_____
Incineration	____/____/____	Location	_____
Burial	____/____/____	Location	_____
Reclassified	____/____/____	Contractor	_____

7/5/88

031

FAFB

Pumps below Ft Wright

2 10 100KVA $\Delta \Delta$ connected 13.2K-480V

3 wooden station

EPA inspected inquiry about PCB inspection one leaked

Contacted by

GARY JESPERSEN

247-5847

92 CSG/DEEN

Fairchild AFB, WA 99011

Some question about ownership

Prints appear to indicate FAFB ownership
no stencil numbers
but entered as circles rather than
squares (indicating company ownership)

Ralph believe we have a maintenance
contract on stations
doesn't recall any tests taken

No record of tests in PCB book &
inherited from Ralph

Dan Miller went out to determine
feasibility of pulling samples and
to look for indication of ownership
and stencil marks - he believes (after inspection)
FAFB owns all 12 100KVA units and
we own 2 small lighting posts
Will need to arrange with FAFB to
meet with key to get in.

Serial num's at well #5

Could not take samples.

6912141

6912147

6912149

7514286

7514289

7514291

Talked to Pottratz we should pull samples
regardless of ownership 4499

Ralph suggests look through Donethair central
file and also run serial num's by Patty
for computer check and by stores files.

2
per Gary Jespersen
contact Chit Monzhi-
Water Dist manager
247-2183
to arrange for key.

CHIT
MONZHI
247-2183

SGT
SNODGRY
247-2183

Per Rick

Talk Frank Meland about disposition of Jack
Kuchevski files

Also contact marketing sales

Mike Dorengo 2009 - now his account

Don Crisp had the old files - found and
copied same as supplied by Gary Jespersen.
Still inconclusive as to "transformer"

Judy did a check of computer files "transformer"
no history of transformer by serial number

Pete Hatcher says he has no records (he keeps
power transformer with secondary voltage > 2300V)
He feels if no stencil number then they
probably are.

Cheryl of CAM checked for PCB test by serial
number.

Checked lock on gate (1/1/88)

Talked to Chit - he says go ahead and replace
with WWP locks except main gate. I convinced
him to keep both of our locks on all gates.

Dan M. handled locks and pulled 14 oil
samples (7/8/88)

Serial numbers

Well 6: 7222 333
7222 334
7222 335

Well #7 1961-1
1961-5
1961-7

9847209 (15KVA)

Well #5 see page 1
and
7335024 (5KVA)

Will visit site with Doug R. Mon. afternoon

7/14/88.

001

Doug Rotholz and I checked Well # 5, 6, 7 (FAFB) behind Ft. Wright

#5 3 units leaky - Ser # 7514286, 289, _____
couldn't get 3rd serial # but have elsewhere.
only fresh oil due to sampling
GE 10-C oil

#6 GE - just says oil
no leakage

#7 GE - 10-C oil
no leakage

Exposed low secondaries #6

Exposed low primary #7

Then they were working this job.

We also swung by Heiger Reservoir at
Spotted Rd & Airport Drive NW corner (BLDG 2741)

2 3Q 250KVA 6600/13200V - 2300/2185 (4185?)

GE SER # 1374190
173 5550

dirty with old leakage

SOUND AM
SERV.

8/2/88

4.1 ppm

2.5 ppm

Cheryl shows they are ours but no PCB
tests - Dan Miller will probably pull samples
today.

Whose responsibility are CT's & PT's - secondary
messed but 2300v

2300v 3Q switch appears to be oil filled and
leaking. Also a non-leaking distribution
transformer at site.

1/26/88 FAFB FT WRIGHT WELLS 5, 7, 6

DJM

8/4/88 read test results

8/5/88 gave job to Miller to tag & wipe down
well transformers & reservoir trans.

8/8/88 (?) Williamson tagged reservoir trans. (2 ea)

8/11/88 Williamson tagged remainder - all
well transformers (14 ea).Well #5 (nearest main gate)

over 500

6912141 (GE)

100KVA 1Ø

no sign of leakage
rect. PCB tag

6912147 (GE)

100KVA 1Ø

no sign of leakage
rect PCB tag

6912149 (GE)

100KVA 1Ø

no sign of leakage
rect PCB tag

50-500

7514286 (GE)

100KVA 1Ø

leakage around plug at base
most due to or since sample
taken

7514289 (GE)

100KVA 1Ø

round yellow tag
no sign of leakage

7514291 (GE)

100KVA 1Ø

round yellow tag
leakage around plug at base
most due to or since sample
taken
round yellow tagWell #7

1961-1 (CTC)

100KVA 1Ø

<50

no sign of leakage
round green sticker

1961-5 (CTC)

100KVA 1Ø

50-500

no sign of leakage
round yellow sticker

1961-7 (CTC)

100KVA 1Ø

50-500

no sign of leakage
round yellow sticker

p2

Well #167222333 (GE)
100 KVA

50-500

old oil (wipeable?) on secondary
bushing

no evidence of leakage

no evidence on concrete pad
of leakage

round yellow tag

7222334 (GE)
100 KVA

50-500

old oil (wipeable?) on secondary
bushing

no evidence of leakage

no evidence on concrete pad
of leakage

round yellow tag

7222335 (GE)
100 KVA

<50

old oil (wipeable?) on secondary
bushing

no evidence of leakage

no evidence of leakage on to
concrete pad

round green sticker

Pole mount 1Ø transformers

near Well #5

- 5 KVA 1Ø

7335024 (probable GE) SB 3110

50-500 ppm

no sign of leakage

round yellow sticker

at Well #6

- 15 KVA 1Ø

9847209

<50 ppm

no sign of leakage

round green sticker

p.3

8/23/88

Under direction of Potlitz, Betty and I took soil samples at each transformer (14 ea) labelled and turned into ABC labs - rush - 24 hr soak time on soil samples - requested Well 5 earliest possible.

8/24/88

Met with Rich V, Mike D'Aleings, Doug Potlitz, to discuss situation
Handle first - then determine ownership -

Per Mike D. - FAFB has been paying maintenance contract

Above mentioned individuals and myself met at Well site with 2 individuals from FAFB. Expressed our concern for immediate response to contamination & leakage problem. We can handle or they can handle but immediate response is mandatory. Inspected Well sites.

They will get back to us -

Jim Spangler
247-5847

(more senior)

Bill Purvis

8/24/88

Looked over stores records of transformer purchase records (log of stencil name assigned) 1935 thru 1972. No record of the 100KVA purchase.

Looked over purchasing computer listing of our transformers - no record and no units with close serial numbers.

Contacted Ginny Lunger in Finance - she and Reno Hatcher researched their yellow card file of purchased transformers - no record -

Ginny contacted GE - Well #5 units (>500) sold to someone 1942; Well #5 (50-500) sold to someone 1944; Well #6 units (50-500 < 50) sold to someone 1943. 5KVA Pole Mt sold to someone 1943. They will research who units were sold to.

Rich suggests I search Engineering Vault on 3rd Floor

8/25/88 inspected site alone

Mike Dahl & Doug Pothatz installed oil absorbing pads at leaking contaminated units at Well 5.
no word from FAFB

8/26/88

Per Doug P. FAFB claims existence of a sale agreement made in 1983. We and they will attempt to locate copy

Doug P. inspected site - attempted to - WWP lock and locking mechanism missing from main gate - could not get in. Doug contacted Spangler. Looking into.

TELEPHONE CALL RECORD

ROUTING

DATE: 8/23/88 TIME IN: 9:05 TIME OUT: 9:15

A) CALL FROM: Doug Potttratz

TITLE: ENV. Svc. Dept. Wash. Water Power

LOCATION AND PHONE NO.: Washington Water Power

B) CALL TO: Eileen Hayes

TITLE: PCB Case Reviewer

LOCATION AND PHONE NO.: TSB 2-2584

☒ CASE FILE
☐ ENFORCEMENT
☐ SENSITIVE
☐ ACTION NEEDED

XX

SUMMARY OF CALL:

Mr. Potttratz returned my call of previous day re: transformers mentioned in Fairchild AFB inspection report. Potttratz stated he was meeting w/ Fairchild AFB personnel to discuss ownership of the transformers on Wednesday 8/24. During the interim W.P. had tested the transformers (results showed some PCB, ^{not} PCB-contaminated or non-PCB. Questioned him specifically regarding those located near Spokane River. - He did not have analysis in front of him) so wasn't sure where PCB transformers were located. W.P. has initiated clean-up. Potttratz stated that it is W.P. policy to retrofit or replace PCB transformers located near pump stations. Requested copies of all chemical analysis and cleanup documentation regarding these transformers be mailed to me ASAP. Potttratz indicated that a map was being prepared for Wed mtg w/ Fairchild. I also requested copies of map and a phone call on Thursday to let us know outcome of meeting. Potttratz agreed to mail documentation requested and to call on Thursday (8/25) to inform me of results of Wed. mtg.

Eileen Hayes
(SIGNATURE)

TELEPHONE CALL RECORD

ROUTING

DATE: 8/22/89 TIME IN: 10:47 TIME OUT: 11:07

A) CALL FROM: Eileen Hayes

TITLE : PPB Case Reviewer

LOCATION AND
PHONE NO.

: PTSB 2-2584

B) CALL TO : Gary Jesperson

TITLE : Chief - Env. Planning

LOCATION AND
PHONE NO.

: Fairchild AFB 509-247 5847

[illegible]

SUMMARY OF CALL:

Spoke w/ receptionist - (person) on leave. Referred to William Purvis. Fairchild AFB RCRA Program Mgr.
Re: Storage facility operated by contractor that is located in Engine Test Building 2150

Contractor's name Southeastern Electric, Inc.

8344 EAST R.I Fullerton Hwy Suite 206

Dallas, TX 75228

Local: Southeastern, Clectus Inc.

P.O. Box 1410

Curlew Heights, WA 99007

Also checked out transformers that belong to Washington Power. Stated they had talked to W.P. - transformers have been tested; leaks cleaned up - Have marked & labeled everything - Thought only three were PCB but wasn't sure.

Asked a civil inspection report - indicated I had just begun review and couldn't provide any info at the time.

M. C. Hayes
(SIGNATURE)



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

RECEIVED
JUL 15 1988

PESTICIDES & TOXIC
SUBSTANCES BRANCH
EPA REGION 10

REPLY TO
ATTN OF: ES-098

MEMORANDUM

SUBJECT: TSCA Compliance Inspection at Fairchild
Air Force Base, Spokane, Washington

FROM: Jim Pankanin, Environmental Engineer
Technical Support Branch

TO: Gil Haselberger, Chief
Toxics Substances Section

Attached for your review is a copy of the TSCA inspection report for the June 7 and 9, 1988 inspection at Fairchild. Potential violations which were noted include, 1) an incomplete 1985 Annual Report; 2) inadequate and out-of-date PCB inventory database; 3) an out-of-service transformer was stored over thirty days in an area not designated as SFD; 4) PCB transformers were stored in the SFD for over one year; and 5) several violations of the SFD standards regarding record keeping and inadequate secondary containment.

Additionally, I noted several leaking transformers which were allegedly owned by Washington Water Power. The transformers were not marked with an ML. A couple of the leakers were located approximately 150 feet from the Spokane River.

This inspection is part of a multi-media inspection that I am coordinating for this facility. Please keep me apprised of any planned enforcement actions against Fairchild so that I can schedule the communications between EPA and Fairchild in a logical fashion. Thank you.

Attachment

cc: Paul Boys
Clark Smith, WD-136

Facility:

Fairchild Air Force Base
Spokane, Washington 99011-5000

Participants:

J. Pankanin
James F. Pankanin, U.S. EPA Region 10, ES-098, (2-6) 442-8561
Gary Jespersen, Fairchild, Chief-Environmental Planning, (509) 247-5847
William Purvis, Fairchild, Base RCRA Program Manager, (509) 247-5847

Inspection Commenced:

June 7, 1988 09:00
June 9, 1988

Background:

A previous TSCA inspection at this facility was conducted by Michael Hoyles on January 15, 1987. EPA issued a follow-up Notice of Noncompliance on May 1, 1987 which cited several violations including, but not limited to:

1. Incomplete and inadequate quarterly inspections;
2. Insufficient 1985 annual report;
3. Inadequate containment of PCB-contaminated debris.

Inspection of Facility:

I presented my inspector credentials and copies of a Notice of Inspection and Receipt for Sample and Documents (attachments 1 and 2) to Gary Jespersen. We then worked through the TSCA inspection checklist (attachment 3). Also present were Bill Purvis, Fairchild RCRA Program Manager, Lee Nelson and Rich Brooks of the Fairchild Civil Engineering Operations and Maintenance (O+M) Branch. Gary Jespersen explained that Fairchild Air Force Base (FAFB) is in the process of upgrading its electrical system and that all or most of the facility PCB equipment will be removed from service with one year. Lee Nelson explained that the O+M branch includes a staff of ten people (two civilian and eight military), who are responsible for servicing and/or removing all transformers and capacitors on the facility. At the time of this inspection, there was also a contractor at FAFB who was removing transformers and placing the PCB transformers into a storage for disposal (SFD) area.

I asked for copies of the two most recent PCB annual documents. Gary Jespersen stated that the 1987 document was still being prepared, so he gave me copies of the 1985 and 1986 annual documents (attachments 4 and 5). I observed that the 1985 document did not specify where the off-site shipments of PCB were shipped as required by 40CFR761.80(a)2. Jespersen explained that there were no shipments of PCBs off-site in 1987. The most recent PCB shipment was on February 26, 1988 to North American Electric. According to the annual documents several PCB transformers were stored in the SFD for over three years. Jespersen explained that in the past the Fairchild Defense Resources Marketing Office (DRMO) had to contract separately for each shipment

*W
7-1988*

of PCB materials off-site. Because of these administrative difficulties, Jespersen stated that DRMO preferred to wait until a full truckload of PCB materials was ready to be disposed of prior to initiating the contract procedures. Since February 1988, DRMO had had a long term contract in place for PCB disposal. This contract mechanism will be beneficial to FAFB since so many PCB transformers will be removed from service in 1988.

FAFB maintains a computerized data base which includes information on all known items that have ever been found at the facility that contain or were tested for PCB. The database had 762 items listed although 650 of these items had less than 500 ppm PCB. This database is designed to include the item location, concentration, serial number, volume, weight, and date shipped off-site. I obtained a sorted printout of all materials greater than 499ppm (attachment 6). Bill Purvis of FAFB acknowledged that the database was not completely up-to-date since the February 26, 1988 shipment information had not yet been entered in the database. Additionally, Lee Nelson and Gary Jespersen later acknowledged that the ongoing contractor transformer removal project had already turned up 54 transformers which had not been previously identified in this database. Lee Nelson told me later the next day that data had been located for 26 of these 54 transformers which indicated that these transformers contained less than 50ppm PCB. Gary Jespersen agreed to have these 54 transformers entered in the database as soon as possible. At the time of the inspection, the PCB database included 112 PCB items at FAFB with a concentration greater than 499ppm PCB.

We began the facility tour by inspecting two sets of pole-mounted capacitors. The first set of six capacitors located near building 2000 were all marked with an M_L. There was also an M_L on the pole. The second set of 3 pole-mounted capacitors were non-PCB. FAFB workers were observed placing blue labels on each capacitor which certified these capacitors as containing less than 50ppm PCB (attachment 7). Photos were taken of each location.

We then proceeded to buildings 2125 and 9000 where the quarterly and daily inspection reports indicated that there were leaking PCB transformers. The building 2125 transformer was located indoors in a bermed area with drip pans containing absorbent materials under the leak. It was marked with an M_L. FAFB records indicated that this transformer was taken out of service on March 12, 1988 by the contractors working on the FAFB electrical upgrade project. I spoke with Art Goodkin of the FAFB Corps of Engineers tenant office who is managing the contractor PCB project. He stated that the existing contract did not include removal and disposal of the building 2125 transformer. I explained that the current scenario was considered a temporary SFD and was only allowed for 30 days under 40CFR761.65(c).

There were 5 transformers in service in building 9000, the FAFB hospital. All were properly labeled. One transformer had a slow leak (about 1 drop per day) and was equipped with a drip pan with absorbent material. Gary Jespersen stated that all these transformers were to be removed from service within 90 days. We then proceeded to the SFD areas in the Engine Test Building (building 2150). There are 2 SFD areas inside this building, one operated by FAFB and the other operated by the electrical contractor. The doors to both areas were locked and marked with M_L labels. The FAFB SFD was equipped with a room-sized steel drip pan. There were 26 transformers and 9 drums of PCB materials in the SFD. There were an inventory log sheet and inspection records for this area. All these PCB materials were

moved into the SFD on April 27, 1988 after FAFB personnel noted that the electrical contractors were not previously storing the transformers in an acceptable SFD area. All these PCB materials were labeled and dated.

The contractor SFD area in the Engine Test Building was located in a separate room. I counted 31 transformers stored in drip pans with six inch berms. All were labeled, dated and marked with their respective weights. There were 4 drums of PCB materials including one that appeared to contain liquids. These drums were stored on a plastic sheet, but there was no secondary containment. There was a considerable amount of building demolition debris scattered throughout the room. There was also what appeared to be a board covered elevator shaft in the center of the SFD area floor. This floor area was not impermeable. There were no inventory log sheets or inspection records available for this area. Additionally, it was noted that there was puddling of what appeared to be rainwater in one area of the room. It was likely that the roof had some leaks above this area. I took several flash photographs of both SFD areas, but they were underexposed.

The last SFD that we inspected was in building 2451. There were 2 PCB transformers and 1 drum of PCB contaminated materials in storage. All of these items were dated and labeled. There was a continuous six inch berm around the perimeter of the room. No violations were noted regarding this SFD.

Outbriefing:

We met with the FAFB Deputy Civil Engineer, Fred Zitterkopf, at the conclusion of the inspection. I informed Mr. Zitterkopf of the potential TSCA violations that I had noted during the inspection. I specifically included the following:

1. The 1985 Annual Report does not specify the disposal facility for the off-site shipments.
2. The PCB database was not current and did not contain all the transformers at FAFB. An example is the 54 transformers that were identified during the ongoing transformer removal project.
3. The out-of-service transformer in building 2125 is not located in a designated SFD area.
4. The contractor SFD area in the Engine Test Building is not being properly operated as an SFD. There were no inventory or inspection records. There was combustible debris in the area. And there was inadequate secondary containment of PCB items.

Mr. Zitterkopf thanked me for the inspection and assured me that he would make sure that all these potential violations would be corrected as soon as possible.

June 9, 1988 Inspection:

As part of the multi-media inspection at FAFB, I participated in the Safe Drinking Water Act inspection on June 9, 1988. We took water samples at the pumphouse at the wellheads near the Spokane River. I noticed that there were 3 banks of 3 large transformers serving these pumphouses. Gary Jespersen told

me that these transformers were owned and operated by Washington Water Power. Each set of transformers was fenced and locked. I could see obvious oil-staining on the concrete base under the transformers servicing Well #5. Most of these transformers are located within 150 feet of the Spokane River. None of the transformers were labeled with an M_L and none of the transformers had secondary containment. I took photographs of these transformer banks.

I also noticed two large General Electric transformers servicing the pumphouse at the Geiger Reservoir near Spokane Airport southeast of FAFB. This area was fenced and labeled. The transformers were not marked with a M_L label. The transformers were supported by large wooden ties mounted on a gravel pad. There was no secondary containment. Both transformers had obvious oil staining along the bottoms. Gary Jespersen informed me that these transformers were also owned by Washington Water Power. I photographed these transformers also.

A couple weeks after the inspection, I called Gary Jespersen of FAFB and recommended that he call Washington Water Power to get some information regarding these transformers. I gave him the name and telephone number of Fred Shiosaki at Washington Water Power (509-489-0500,2486). Gary told me that he would look into it.

Photo Log

Attachments

Doug Portch

FAIRCHILD AIR FORCE BASE
June 7, 1988
Photo Log

Slide No.

- 1-4) Photos were not exposed
- 5-5) Pole-mounted PCB capacitor bank with M_L
- 7) Pole-mounted capacitors being marked with blue label (no PCB)
- 8-9) Out-of-service PCB transformer in building 2125. Equipped with drip pan within bermed area
- 10-11) Leaking PCB transformer with drip pan in bermed area in hospital (building 9000)
- 12) Storage for disposal area with room-sized drip pan
- 13) Photo did not come out
- 14-19) Underexposed photos of contractor storage for disposal area in Engine Test Building
- 20) Doors to contractor storage for disposal area marked with M_L
- 21) Underexposed photo of waste PCB drum in bermed area in building 2451

Roll No. 2 June 9, 1988

- 1) Not exposed
- 2) Location for well sample number 0070
- 3-5) Photos for oil-stained transformer. No M_L and no secondary containment. Alleged to be property of Washington Water Power
- < 6-7) Second bank of transformers at Spokane River pumphouse
- < 8-11) Oil-stained transformers near Geiger Reservoir. No M_L and no secondary containment. Alleged to be property of Washinton Water Power
- 12-16) Drinking water sampling at pumphouse number 2